TSD File Inventory Index

Date: July 7, 2004

Initial: CM Kenevan

Facility Name	Sonoco Flexible Packaging Inc. (Mt Teller Site)		
Facility Identification Number	OHD 058 394 313		
A.1 General Correspondence	Y	**B.2 Permit Docket (B.1.2)**	
A.2 Part A / Interim Status	Y	1 Correspondence	
1 Correspondence	Y	.2 All Other Permitting Documents (Not Part of the ARA)	
2 Notification and Acknowledgment	Y	**C.1 Compliance - (Inspection Reports)**	Y
.3 Part A Application and Amendments	Y	**C.2 Compliance/Enforcement**	Y
4 Financial Insurance (Sudden, Non Sudden)	X	.1 Land Disposal Restriction Notifications	
5 Change Under Interim Status Requests		.2 Import/Export Notifications	
6 Annual and Biennial Reports		**C.3 FOIA Exemptions - Non-Releasable Documents**	
A.3 Groundwater Monitoring		**D.1 Corrective Action/Facility Assessment**	Y
1 Correspondence		.1 RFA Correspondence	
2 Reports		.2 Background Reports, Supporting Docs and Studies	
A.4 Closure/Post Closure		.3 State Prelim. Investigation Memos	
1 Correspondence	Y	4 RFA Reports	X
2 Closure/Post Closure Plans, Certificates, etc		**D. 2 Corrective Action/Facility Investigation**	
A.5 Ambient Air Monitoring		1 RFI Correspondence	
1 Correspondence		.2 RFI Workplan	
2 Reports		3 RFI Program Reports and Oversight	
B.1 Administrative Record		4 RFI Draft /Final Report	

Total - 1

5 RFI QAPP		7 Lab data Soil Sampling/Groundwater	
6 RFI QAPP Correspondence		8 Progress Reports	
7 Lab Data, Soil-Sampling/Groundwater		**D.5 Corrective Action/Enforcement**	
8 RFI Progress Reports		1 Administrative Record 3008(h) Order	
9 Interim Measures Correspondence		.2 Other Non-AR Documents	
10 Interim Measures Workplan and Reports		**D.6 Environmental Indicator Determinations**	
D.3 Corrective Action/Remediation Study		.1 Forms/Checklists	
.1 CMS Correspondence		**E. Boilers and Industrial Furnaces (BIF)**	
.2 Interim Measures		.1 Correspondence	
.3 CMS Workplan		.2 Reports	
.4 CMS Draft/Final Report		**F Imagery/Special Studies** (Videos, photos, disks, maps, blueprints, drawings, and other special materials.)	Y
.5 Stabilization		**G.1 Risk Assessment**	
.6 CMS Progress Reports		.1 Human/Ecological Assessment	
.7 Lab Data, Soil-Sampling/Groundwater		.2 Compliance and Enforcement	
D.4 Corrective Action Remediation Implementation		.3 Enforcement Confidential	
1 CMI Correspondence		.4 Ecological - Administrative Record	
.2 CMI Workplan		.5 Permitting	
3 CMI Program Reports and Oversight		.6 Corrective Action Remediation Study	
4 CMI Draft/Final Reports		.7 Corrective Action/Remediation Implementation	
.5 CMI QAPP		.8 Endangered Species Act	
6 CMI Correspondence		.9 Environmental Justice	

Note Transmittal Letter to Be Included with Reports
Comments Documents do not justify individual folder/schedule

A.1 Public Participation

VERIFICATION OF RECEIPT OF PUBLIC REVIEW MATERIALS

NAME OF LIBRARY CONTACT, LIBRARY AND LOCATION:

Ms. Jane Messingschlager
Franklin Public Library
400 Anderson St.
Franklin, OH 45005

FACILITY NAME, LOCATION AND ID #:

OHD 058394313
Colorpac, Inc.
708 South Avenue
Franklin,. OH 45005

MATERIALS RECEIVED:

Fact sheet
Public notice

DATE RECEIVED/MADE AVAILABLE TO PUBLIC:

SIGNATURE OF RECEIVING PARTY:

PLEASE RETURN (IN SELF-ADDRESSED, POSTAGE AND FEES PAID, ENVELOPE) TO:

U.S. Environmental Protection Agency
5HW-13
230 S. Dearborn Street
Chicago, IL 60604

Attention: Christine Klemme

Material Received -
Jane Messingschlager

PUBLIC VOUCHER FOR ADVERTISING

For Agency Use Only
VOUCHER NUMBER
SCHEDULE NUMBER
PAID BY

DEPARTMENT OR ESTABLISHMENT, BUREAU OR OFFICE
United States Environmental Protection Agency, WMD,SWB

PLACE VOUCHER PREPARED
230 S. Dearborn, Chicago, IL 60604

DATE PREPARED
1/24/85

NAME OF PUBLICATION
Franklin (Ohio) Chronicle

NAME OF PUBLISHER OR REPRESENTATIVE

ADDRESS (*Street, room number, city, State, and ZIP code*)
42 E. Fourth St. Franklin, Ohio 45005 ATTN: Phillip Jackson
P.O. Box 99
(513) 746-3691

CHARGES

TYPEFACE (*size of type*) POINT PER (*inch, square, word, or folio*)

		NUMBER OR LINES (*Indicate counted or space*)	COST PER LINE	TOTAL COST
Line Rates	FIRST INSERTION		$	$
	ADDITIONAL INSERTIONS GIVE NUMBER ▶			
	TOTAL			$
		NUMBER OF UNITS (*Indicate inch, square, word, folio*)	COST PER UNIT	TOTAL COST
Other Rates	FIRST INSERTION		$	$
	ADDITIONAL INSERTIONS GIVE NUMBER ▶			
	TOTAL			$

Attach one copy of advertisement (*including upper and lower rules*) to each copy of voucher here. If copy is not available sign the following affidavit.

TOTAL LINE RATES AND OTHER RATES	
LESS DISCOUNT AT %	
BALANCE DUE	$
VERIFIED (*Initials*)	

AFFIDAVIT

This represents a true billing for the attached advertising order, with specifications and copy, which has been completed.

SIGNATURE OF PUBLISHER OR REPRESENTATIVE

TITLE

DATE

FOR AGENCY USE ONLY

ADVERTISEMENT PUBLISHED IN

DATE PUBLISHED

I certify that the advertisement described above appeared in the named publication and that this account is correct and eligible for payment.

SIGNATURE AND TITLE OF CERTIFYING OFFICER

DATE

SIGNATURE AND TITLE OF AUTHORIZING OFFICER

DATE

ACCOUNTING CLASSIFICATION

DISPLAY ADVERTISEMENT

Estimate with Affidavit: $120.00

SQ0072 5A4E055002 25.46

PAID BY CHECK NUMBER

[1] If the ability to certify and authority to approve are combined in one person enter "N/A" (*not applicable*) here.

☆ GPO : 1980 O - 311-153 (6100)

September 1973
4 Treasury FRM 2000

Standard Form No. 1143

CONTAC Christine Klemme (312) 886-371

ADVERTISING ORDER

551061NASA
ORDER NUMBER

DEPARTMENT OR ESTABLISHMENT, BUREAU OR OFFICE
U.S. Environmental Protection Agency, Waste Management Div. Solid Waste Br

DATE
1/24/85

The publisher of the publication named below is authorized to publish the enclosed advertisement according to the schedule below provided the rates are not in excess of the commercial rates charged to private individuals with the usual discounts. It is to be set solid, without paragraphing, and without any display in the heading unless otherwise expressly authorized in the specifications.

NAME OF THE PUBLICATION ADVERTISED IN
Franklin (ohio) Chronicle

SUBJECT OF ADVERTISEMENT	EDITION OF PAPER ADVERTISEMENT APPEARED
PUBLIC NOTICE	Wednesday morning (prints once a week)
NUMBER OF TIMES ADVERTISEMENT APPEARED	**DATE(s) ADVERTISEMENT APPEARED**
One Time	February 6, 1985

SPECIFICATIONS FOR ADVERTISEMENT

Please place in legal notice/classified section

COPY FOR ADVERTISEMENT

See attached sheet

AUTHORITY TO ADVERTISE	INSTRUMENT OF ASSIGNMENT
NUMBER: 551061NASA	NUMBER:
DATE: January 28, 1985	DATE:
SIGNATURE OF AUTHORIZING OFFICIAL: Brigitte Marafee	TITLE:

INSTRUCTIONS TO PUBLISHERS

Extreme care should be exercised to insure that the specifications for advertising to be set other than solid be definite, clear, and specific since no allowance will be made for paragraphing or for display or leaded or prominent headings, unless specifically ordered, or for additional space required by the use of type other than that specified. Specifications for advertising other than solid and the advertisement copy submitted to the publisher will be attached to the voucher. The following is a sample of solid line advertisement set up in accordance with the usual Government requirements.

DEPARTMENT OF HIGHWAYS & TRAFFIC, D.C. Bids are requested for first spring 1966 cement concrete repair contract, including incidental work, Washington, D.C., Invitation No. C-5576-H, consisting of 11,000 sq. yds. PCC Class BB sidewalk repair and 2,000 cu. yds. PCC Class A pavement, alley, & driveway repair, both cut repairs only. Bidding material available from the Procurement Officer, D.C. Sealed bids to be opened in the Procurement Office at 8:00 p.m., November 15, 1965.

Your bill for this advertising order should be submitted on the "Public Voucher for Advertising" form, which is printed on the reverse of this form, immediately after the last publication of the advertisement. If copies of the printed advertisement are not available, complete the affidavit provided on the voucher. Submit the voucher and a copy of the printed advertisement to ▶

U.S. Environmental Protection Agency
FINANCIAL OPERATIONS SECTION
230 S. Dearborn St.
Chicago, IL 60604

IMPORTANT

Charges for advertising when a cut, matrix, stereotype or electrotype is furnished will be based on actual space used and no allowance will be made for shrinkage.

In no case shall the advertisement extend beyond the date and edition stated in this order.

1143-107

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

DATE: March 13, 1985

SUBJECT: End of Comment Period for Colorpac Closure
OHD058394313

FROM: Christine Klemme, EPA
AIS

TO: Becky Strom

The comment period ended for Colorpac on March 11, 1985.

No comments were received.

EPA FORM 1320-6 (REV. 3-76)

PUBLIC NOTICE

The United States Environmental Protection Agency (U.S. EPA) has received a certification of change in status from Colorpac, Incorporated, (Colorpac), located at 708 South Avenue, Franklin, Ohio. Colorpac has stored hazardous waste (as defined by federal law) in containers. This action will change the status of Colorpac from a storage facility to that of a generator storing for fewer than 90 days (per 40 CFR 262.34). The status change for this facility was effected by removing hazardous waste stored for longer than 90 days and by limiting the present accumulation period to fewer than 90 days. The facility will be subject to the special provisions of 40 CFR 261.5 for small quantity generators in any calendar month if it generates less than 1000 kilograms of hazardous waste in that month.

The certification of change in status was submitted to satisfy regulations promulgated under the Resource Conservation and Recovery Act, as amended. U.S. EPA required the certification of change in status when Colorpac requested a change in status from a storage facility to a small quantity generator.

The certification and related background materials are available to the public at the U.S. EPA, Solid Waste Branch, 230 South Dearborn Street, 13th Floor, Chicago, Illinois 60604, (312) 886-3715, from 8:30 a.m. to 4:30 p.m., Monday through Friday. These materials also may be seen during business hours at the Franklin Public Library, 400 Anderson Street, Franklin, Ohio, (contact the Head Librarian).

Public comments concerning the certification or this action are invited by U.S. EPA and will be accepted through March 11, 1985. Please send comments to:

U.S. Environmental Protection Agency
RCRA Activities
A-3587
Chicago, Illinois 60690-3587
ATTN: Christine Klemme

Christine Klemme

PUBLIC NOTICE

The United States Environmental Protection Agency (U.S. EPA) has received a certification of change in status from Colorpac, Incorporated, (Colorpac), located at 708 South Avenue, Franklin, Ohio. Colorpac has stored hazardous waste (as defined by federal law) in containers. This action will change the status of Colorpac from a storage facility to that of a generator storing for fewer than 90 days (per 40 CFR 262.34). The status change for this facility was effected by removing hazardous waste stored for longer than 90 days and by limiting the present accumulation period to fewer than 90 days. The facility will be subject to the special provisions of 40 CFR 261.5 for small quantity generators in any calendar month if it generates less than 1000 kilograms of hazardous waste in that month.

The certification of change in status was submitted to satisfy regulations promulgated under the Resource Conservation and Recovery Act, as amended. U.S. EPA required the certification of change in status when Colorpac requested a change in status from a storage facility to a small quantity generator.

The certification and related background materials are available to the public at the U.S. EPA, Solid Waste Branch, 230 South Dearborn Street, 13th Floor, Chicago, Illinois 60604, (312)886-3715, from 8:30 a.m. to 4:30 p.m., Monday through Friday. These materials also may be seen during business hours at the Franklin Public Library, 400 Anderson Street, Franklin, Ohio, (contact the head Librarian).

Public comments concerning the certification or this action are invited by U.S. EPA and will be accepted through March 11, 1985. Please send comments to:

U.S. Environmental Protection Agency
RCRA Activities
A-3587
Chicago, Illinois 60690-3587
ATTN: Christine Klemme

A.2 Part A/
Interim Status

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION 5
RCRA ACTIVITIES
P.O. BOX A3587
CHICAGO, ILLINOIS 60690

DEC 21 1990

Mr. Ron Kline
Graphic Packaging Corporation
P.O. Box 308
Franklin, OH 45005-0308

RE: EPA ID #: OHD 058 394 313

In response to your request of December 6, 1990 the following information has been updated:

Installation Name: Graphic Packaging Corporation

Hazardous Waste Description Codes: F003, D001

If you have questions, please contact Sharon Kiddon at (312) 886-6173.

Sincerely,

Bernie Orenstein

for Arthur S. Kawatachi
Information Management Section
RCRA Program Management Branch

cc: State Agency
File

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION 5
RCRA ACTIVITIES
P.O. BOX A3587
CHICAGO, ILLINOIS 60690

OCT 18 1988

RON KLINE ADM MGR
GRAPHIC PACKAGING OF OHIO
PO BOX 308
FRANKLIN OH 45005

RE: EPA ID #: OHD 058394313

In response to your request of SEP 02 1988 the following information has been updated:

NAME INSTL : GRAPHIC PACKAGING OF OHIO

CONTACT : KLINE RON ADM MGR

ADR : P O BOX 308

OWNER: GRAPHIC PACKAGING

DELETED: TREAT. STORE. DISPOSE

WASTES: PER NOTIF

If you have questions, please contact Sharon Kiddon at (312)886-6173.

Sincerely,

Arthur S. Kawatachi

Arthur S. Kawatachi
Information Section
RCRA Program Management Branch

cc: State Agency
File

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V
111 West Jackson Blvd.
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:
RCRA ACTIVITIES

MAY 27 1982

Mr. Ed Miller
Colorpac Incorporated
708 South Avenue
Franklin, Ohio 45005

RE: Interim Status Acknowledgement USEPA ID No. OHD058394313
FACILITY NAME: Colorpac, Inc.

Dear Mr. Miller:

This is to acknowledge that the U.S. Environmental Protection Agency (USEPA) has completed processing your Part A Hazardous Waste Permit Application. It is the opinion of this office that the information submitted is complete and that you, as an owner or operator of a hazardous waste management facility, have met the requirements of Section 3005(e) of the Resource Conservation and Recovery Act (RCRA) for Interim Status. However, should USEPA obtain information which indicates that your application was incomplete or inaccurate, you may be requested to provide further documentation of your claim for Interim Status. Our opinion will be reevaluated on the basis of this information.

As an owner or operator of a hazardous waste management facility, you are required to comply with the interim status standards as prescribed in 40 CFR Parts 122 and 265, or with State rules and regulations in those States which have been authorized under Section 3006 of RCRA. In addition, you are reminded that operating under interim status does not relieve you from the need to comply with all applicable State and local requirements.

The printout enclosed with this letter identifies the limit(s) of the process design capacities your facility may use during the interim status period. This information was obtained from your Part A Permit application. If you wish to handle new wastes, to change processes, to increase the design capacity of existing processes, or to change ownership or operational control of the facility, you may do so only as provided in 40 CFR Sections 122.22 and 122.23.

As stated in the first paragraph of this letter, you have met the requirements of 40 CFR Part 122.23; your facility may operate under interim status until such time as a permit is issued or denied. This will be preceded by a request from this office or the State (if authorized) for Part B of your application. Please contact Arthur Kawatachi of my staff at (312) 886-7449, if you have any questions concerning this letter or the enclosure.

Sincerely yours,

Karl J. Klepitsch, Jr., Chief
Waste Management Branch

Enclosure

5/24/82

C, A

Please print or type with ELITE type (12 ch ters per inch) in the unshaded areas only

Form Approved. OMB No. 2050-0028. Expires 10-31-91
GSA No. 0246-EPA-OT

Please refer to the *Instructions for Filing Notification* before completing this form. The information requested here is required by law *(Section 3010 of the Resource Conservation and Recovery Act).*

EPA Notification of Regulated Waste Activity

United States Environmental Protection Agency

Date Received (For Official Use Only)

DEC 1 0 1990

I. Installation's EPA ID Number *(Mark 'X' in the appropriate box)*

[ ] A. First Notification [X] B. Subsequent Notification *(complete item C)*

C. Installation's EPA ID Number: OHD058394313

II. Name of Installation *(Include company and specific site name)*

GRAPHIC PACKAGING CORPORATION

III. Location of Installation *(Physical address not P.O. Box or Route Number)*

Street: 708 SOUTH AVENUE

Street (continued):

City or Town: FRANKLIN | State: OH | ZIP Code: 45005-0308

County Code: | County Name: WARREN

IV. Installation Mailing Address *(See instructions)*

Street or P.O. Box: PO BOX 308

City or Town: FRANKLIN | State: OH | ZIP Code: 45005-0308

V. Installation Contact *(Person to be contacted regarding waste activities at site)*

Name *(last)*: KLINE | *(first)*: RON

Job Title: REG COMP MGR | Phone Number *(area code and number)*: 513-746-4511

VI. Installation Contact Address *(See instructions)*

A. Contact Address Location: [X] Mailing: [ ] | B. Street or P.O. Box:

City or Town: | State: | ZIP Code:

VII. Ownership *(See instructions)*

A. Name of Installation's Legal Owner: GRAPHIC PACKAGING CORPORATION

Street, P.O. Box, or Route Number: PO BOX 5000

City or Town: PAOLI | State: PA | ZIP Code: 19301-

Phone Number *(area code and number)*: 215-647-0500

B. Land Type: P

C. Owner Type: P

D. Change of Owner Indicator: Yes [ ] No [X]

(Date Changed) Month: Day: Year:

Please print or type with ELITE type (12 c cters per inch) in the unshaded areas only

Form Approved. OMB No. 2050-0028. Expires 10-31-91
GSA No. 0246-EPA-OT

ID – For Official Use Only

VIII. Type of Regulated Waste Activity *(Mark 'X' in the appropriate boxes. Refer to instructions.)*

A. Hazardous Waste Activity

1. Generator (See Instructions)
   - [X] a. Greater than 1000kg/mo (2,200 lbs.)
   - [ ] b. 100 to 1000 kg/mo (220 – 2,200 lbs.)
   - [ ] c. Less than 100 kg/mo (220 lbs.)
2. Transporter (Indicate Mode in boxes 1-5 below)
   - [ ] a. For own waste only
   - [ ] b. For commercial purposes

   Mode of Transportation
   - [ ] 1. Air
   - [ ] 2. Rail
   - [ ] 3. Highway
   - [ ] 4. Water
   - [ ] 5. Other – specify
3. [ ] Treater, Storer, Disposer (at installation) Note: A permit is required for this activity; see instructions.
4. Hazardous Waste Fuel
   - [ ] a. Generator Marketing to Burner
   - [ ] b. Other Marketers
   - [ ] c. Burner – indicate device(s) – Type of Combustion Device
     - [ ] 1. Utility Boiler
     - [ ] 2. Industrial Boiler
     - [ ] 3. Industrial Furnace
5. [ ] Underground Injection Control

B. Used Oil Fuel Activities

1. Off-Specification Used Oil Fuel
   - [ ] a. Generator Marketing to Burner
   - [ ] b. Other Markerer
   - [ ] c. Burner – indicate device(s) – Type of Combustion Device
     - [ ] 1. Utility Boiler
     - [ ] 2. Industrial Boiler
     - [ ] 3. Industrial Furnace
2. [ ] Specification Used Oil Fuel Marketer (or On-site Burner) Who First Claims the Oil Meets the Specification

IX. Description of Regulated Wastes *(Use additional sheets if necessary)*

A. Characteristics of Nonlisted Hazardous Wastes. Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles. *(See 40 CFR Parts 261.20 - 261.24)*

1. Ignitable (D001)	2. Corrosive (D002)	3. Reactive (D003)	4. EP Toxic (D000)	(List specific EPA hazardous waste number(s) for the EP Toxic contaminant(s))
X				

B. Listed Hazardous Wastes. (See 40 CFR 261.31 – 33. See instructions if you need to list more than 12 waste codes.)

1	2	3	4	5	6
(A) F003	F005	(A) D001			
7	8	9	10	11	12

C. Other Wastes. (State or other wastes requiring an I.D. number. See instructions.)

1	2	3	4	5	6

X. Certification

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment.

Signature	Name and Official Title *(type or print)*	Date Signed
Ron Kline	RON KLINE, REGULATOR COMPLIANCE MGR	12/06/90

XI. Comments

CHANGE IN COMPANY NAME AND WASTE CODES.

Note: Mail completed form to the appropriate EPA Regional or State Office. (See Section III of the booklet for addresses.)

Please print or type with ELITE type *(12 characters per inch)* in the unshaded areas only

Form Approved. OMB No. 2050-0028. Expires 9-30-88. GSA No. 0246-EPA-OT

United States Environmental Protection Agency
Washington, DC 20460

88.8665

EPA Notification of Hazardous Waste Activity

Please refer to the *Instructions for Filing Notification* before completing this form. The information requested here is required by law *(Section 3010 of the Resource Conservation and Recovery Act).*

I. Official Use Only

Comments

C C

Installation's EPA ID Number | Approved | Date Received *(yr. mo. day)*

C F: O H D 0 5 8 3 9 4 3 1 3 T/A C 1

I. Name of Installation

GRAPHIC PACKAGING OF OHIO

II. Installation Mailing Address

Street or P.O. Box

C 3: P O BOX 308

City or Town | State | ZIP Code

C 4: FRANKLIN | OH | 45005

III. Location of Installation

Street or Route Number

C 5: 708 SOUTH AVENUE

City or Town | State | ZIP Code

C 6: FRANKLIN | OH | 45005

IV. Installation Contact

Name and Title *(last, first, and job title)* | Phone Number *(area code and number)*

C 2: KLINE RON ADM MGR | 513 745 4511

V. Ownership

A. Name of Installation's Legal Owner | B. Type of Ownership *(enter code)*

C R: GRAPHIC PACKAGING | P

VI. Type of Regulated Waste Activity *(Mark 'X' in the appropriate boxes. Refer to instructions.)*

A. Hazardous Waste Activity

- [X] 1a. Generator
- [ ] 1b. Less than 1,000 kg/mo.
- [ ] 2. Transporter
- [ ] 3. Treater/Storer/Disposer
- [ ] 4. Underground Injection
- [ ] 5. Market or Burn Hazardous Waste Fuel *(enter 'X' and mark appropriate boxes below)*
  - [ ] a. Generator Marketing to Burner
  - [ ] b. Other Marketer
  - [ ] c. Burner

B. Used Oil Fuel Activities

- [ ] 6. Off-Specification Used Oil Fuel *(enter 'X' and mark appropriate boxes below)*
  - [ ] a. Generator Marketing to Burner
  - [ ] b. Other Marketer
  - [ ] c. Burner
- [ ] 7. Specification Used Oil Fuel Marketer *(or On site Burner)* Who First Claims the Oil Meets the Specification

RECEIVED
SEP 02 1988
U.S. EPA REGION V
SWB — PMS

VII. Waste Fuel Burning: Type of Combustion Device *(enter 'X' in all appropriate boxes to indicate type of combustion device(s) in which hazardous waste fuel or off-specification used oil fuel is burned. See instructions for definitions of combustion devices.)*

- [ ] A. Utility Boiler
- [ ] B. Industrial Boiler
- [ ] C. Industrial Furnace

VIII. Mode of Transportation *(transporters only — enter 'X' in the appropriate box(es)*

- [ ] A. Air
- [ ] B. Rail
- [ ] C. Highway
- [ ] D. Water
- [ ] E. Other *(specify)*

IX. First or Subsequent Notification

Mark 'X' in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your installation's EPA ID Number in the space provided below.

- [ ] A. First Notification
- [X] B. Subsequent Notification *(complete item C)*

C. Installation's EPA ID Number: OHD058394313

'D — For Official Use Only																
C															T/A	C
W																1

X. Description of Hazardous Wastes *(continued from front)*

A. Hazardous Wastes from Nonspecific Sources. Enter the four-digit number from 40 *CFR* Part 261.31 for each listed hazardous waste from nonspecific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
F001	F005				
7	**8**	**9**	**10**	**11**	**12**

B. Hazardous Wastes from Specific Sources. Enter the four-digit number from 40 *CFR* Part 261.32 for each listed hazardous waste from specific sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
19	**20**	**21**	**22**	**23**	**24**
25	**26**	**27**	**28**	**29**	**30**

C. Commercial Chemical Product Hazardous Wastes. Enter the four-digit number from 40 *CFR* Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
37	**38**	**39**	**40**	**41**	**42**
43	**44**	**45**	**46**	**47**	**48**

D. Listed Infectious Wastes. Enter the four-digit number from 40 *CFR* Part 261.34 for each hazardous waste from hospitals, veterinary hospitals, or medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54

E. Characteristics of Nonlisted Hazardous Wastes. Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles. *(See 40* CFR *Parts 261.21 — 261.24)*

- [X] 1. Ignitable *(D001)*
- [ ] 2. Corrosive *(D002)*
- [ ] 3. Reactive *(D003)*
- [ ] 4. Toxic *(D000)*

XI. Certification

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Signature	Name and Official Title *(type or print)*	Date Signed
Ron Kline	RON KLINE, ADMINISTRATIVE MANAGER	8/31/88

Graphic Packaging Corporation of Ohio
A Subsidary of Graphic Packaging Corporation
708 South Avenue
P.O. Box 308
Franklin, Ohio 45005-0308
(513) 746-4511

GRAPHIC PACKAGING Corporation

August 31, 1988

RCRA Activities
U.S. EPA Region V
Waste Management Division
P.O. Box A3587
Chicago, IL 60690

Dear Sirs:

Please find the attached USEPA Form 8700-12. Its purpose for submission is to register a change in ownership and company name. Graphic Packaging Corporation of Ohio was formerly known as Colorpac Incorporated.

Please advise, to my attention, should you need additional information.

Sincerely,

Rodney L. Kline
Manager of Administrations

RLK/di

Enclosure

cc: J. Myers
K. Speckhals
File (2)

A

EPA

ACKNOWLEDGEMENT OF NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

(VERIFICATION)

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act *(RCRA)*. Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER ➤ OHD058394313 REACKNOWLEDGEMENT

COLORPAC INCORPORATED
708 SOUTH AVENUE
FRANKLIN OH 45005

INSTALLATION ADDRESS ➤

708 SOUTH AVENUE
FRANKLIN OH 45005

EPA Form 8700-12B (4-80)

09/29/81

Please print or type with ELITE type *(12 characters/inch)* in the unshaded areas only.

Form Approved OMB No. 158-S79016
GSA No. 0246-EPA-OT

EPA

U.S. ENVIRONMENTAL PROTECTION AGENCY

NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTALLATION'S EPA I.D. NO. OHD 058394313

I. NAME OF INSTALLATION

II. INSTALLATION MAILING ADDRESS

III. LOCATION OF INSTALLATION

PLEASE PLACE LABEL IN THIS SPACE

000793 AUG 25 80

INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law *(Section 3010 of the Resource Conservation and Recovery Act).*

DETACH

FOR OFFICIAL USE ONLY

COMMENTS: C

INSTALLATION'S EPA I.D. NUMBER	APPROVED	DATE RECEIVED (yr., mo., & day)
S F OHD058394313 T/A 2 C 1	A	80 08 18

I. NAME OF INSTALLATION

COLORPAC, INCORPORATED

II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX: 3708 South Avenue

CITY OR TOWN: Franklin, | ST.: OH | ZIP CODE: 45005

III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER: 5 708 South Avenue

CITY OR TOWN: 6 Franklin, | ST.: OH | ZIP CODE: 45005

IV. INSTALLATION CONTACT

NAME AND TITLE (last, first, & job title)	PHONE NO. (area code & no.)
2 Edward F. Miller V.P. Research	513-746-4511

V. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER: 8 American Controlled Industries, Inc.

B. TYPE OF OWNERSHIP (enter the appropriate letter into box): M

F = FEDERAL
M = NON-FEDERAL

VI. TYPE OF HAZARDOUS WASTE ACTIVITY *(enter "X" in the appropriate box(es))*

- [X] A. GENERATION
- [ ] B. TRANSPORTATION *(complete item VII)*
- [X] C. TREAT/STORE/DISPOSE
- [ ] D. UNDERGROUND INJECTION

VII. MODE OF TRANSPORTATION *(transporters only – enter "X" in the appropriate box(es))*

- [ ] A. AIR
- [ ] B. RAIL
- [ ] C. HIGHWAY
- [ ] D. WATER
- [ ] E. OTHER *(specify)*:

VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your Installation's EPA I.D. Number in the space provided below.

- [X] A. FIRST NOTIFICATION
- [ ] B. SUBSEQUENT NOTIFICATION *(complete item C)*

C. INSTALLATION'S EPA I.D. NO.: OHD058394313

IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

EPA Form 8700-12 (6-80)

AUG 20 1980

CONTINUE ON REVERSE

I.D. – FOR OFFICIAL USE ONLY

S													T/A	C
W	O	H	D	0	5	8	3	9	4	3	1	3	5	1
1	2											13	14	15

IX. DESCRIPTION OF HAZARDOUS WASTES *(continued from front)*

A. HAZARDOUS WASTES FROM NON–SPECIFIC SOURCES. Enter the four–digit number from 40 CFR Part 261.31 for each listed hazardous waste from non–specific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
7	8	9	10	11	12

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four–digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
19	20	21	22	23	24
25	26	27	28	29	30

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four–digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
U031	U112	U140	U154	U171	U220
37	38	39	40	41	42
U239					
43	44	45	46	47	48

D. LISTED INFECTIOUS WASTES. Enter the four–digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54

E. CHARACTERISTICS OF NON–LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non–listed hazardous wastes your installation handles. *(See 40 CFR Parts 261.21 – 261.24.)*

☐ 1. IGNITABLE (D001) ☐ 2. CORROSIVE (D002) ☐ 3. REACTIVE (D003) ☐ 4. TOXIC (D000)

X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE	NAME & OFFICIAL TITLE *(type or print)*	DATE SIGNED
E. F. Miller	V. P. Dir R&D	8/14/80

EPA Form 8700-12 (6-80) REVERSE

COLORPAC INCORPORATED P.O. BOX 308 FRANKLIN, OHIO 45005–0308 AREA 513–746–4511

Q

February 11, 1986

RCRA Activities
Region V
P.O. Box A3587
Chicago, Illinois 60690

Attention: ATKJG

Gentlemen:

Subject: YOUR LETTER REGARDING HAZARDOUS WASTE PERMIT APPLICATION

Colorpac, Incorporated requested a withdrawal of "Part A" on October 15, 1982, requested a change in status on January 10, 1985 and subsequently was certified as a Generator. Please find the Public Notice attached.

The certification regarding potential release from Solid Waste Management Units is being completed from a Generators status.

Please feel free to contact my office should you need additional information.

Respectfully yours,

COLORPAC, INCORPORATED

Rodney Lee Kline

Rodney L. Kline
Vice President/Operations

RLK/eh
Enclosure

cc: Normand Dufour
Gary Waters

logged-off
11/13/81

COLORPAC INCORPORATED · 708 SOUTH AVENUE · FRANKLIN, OHIO 45005 · AREA 513-746-4511 · CINCINNATI-628-4933 · DAYTON-222-5545

November 3, 1981

RCRA Activities
Region V
PO Box A 3587
Chicago, Illinois 60690-3587
Attn: Ms. Diane Schlitz

Dear Ms. Schlitz:

SUBJECT: OHD058394313

We are returning our hazardous waste permit application with the incomplete parts completed, also find attached, an aerial photo of our operation along with a photo of our hazardous waste storage area. Find also attached is a sketch of the maximum hazardous waste we would store at one time. Every effort is made to keep this to a minimum at all times. This material is incinerated by the city of Cincinnati at various intervals as we accumulate it.

If you have any further questions, please call.

Respectfully yours,

COLORPAC, INCORPORATED

Edward F. Miller

Edward F. Miller
Vice President
Research & Development

EFM/mc
Attach.
cc: Grant Newell
Ron Kline
Joe Brzezinski

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:

RCRA ACTIVITIES

OCT 1 6 1981

Colorpac Inc.
Ed Miller
708 South Avenue
Franklin, OH 45005

RE: Hazardous Waste Permit Application-Incomplete Part A (OHD058394313)
Facility Name (and EPA ID number)
Facility Address

We have completed our review of your Part A RCRA permit application for the facility referenced above. The application was incomplete; therefore, we are returning it to you along with a checklist which indicates the missing items. Please complete all missing items marked with an asterisk (*) on the application form, and return the form in time to reach this office by November 16, 1981. All other missing items marked on the checklist should be completed and may be forwarded to this office under separate cover by December 16, 1981.

All of these items are necessary in order for the U.S. Environmental Protection Agency to determine whether your facility qualifies for interim status. Once you receive interim status, your facility may continue operating under the interim status standards until such time as a Part B application is requested by USEPA. At that time, you will have up to six months to submit the Part B portion of the application and to show that you comply with the final detail technical standards.

Please note that some of your original entries on the forms may be changed. We have coded your forms to accommodate key punching for subsequent computer processing; all of our coding was done in blue ink only.

If you have any questions or wish to discuss the missing items on the checklist, please feel free to contact Diane Schlitz, the reviewer of your application, at (312) 886-3713 or me at (312) 886-7449.

Sincerely yours,

Arthur S. Kawatachi

Arthur S. Kawatachi
Regional Project Officer

Enclosure

P.S. All missing items marked with an asterisk must be submitted to us with a cover letter signed by the appropriate certifying official (Item XIII on Form 1 and/or Item IX and X on Form 3) or his duly authorized representative.

COLORPAC INCORPORATED · 708 SOUTH AVENUE · FRANKLIN, OHIO 45005 · AREA 513-746-4511 · CINCINNATI-628-4933 · DAYTON-222-5545

October 21, 1980

Y.J.Kim
EPA Region V
RCRA Activities
P.O. Box 7861
Chicago, IL 60680

Gentlemen:

Subject: Application for Hazardous Waste Permits.

Find attached the completed forms, EPA form 3510-1 and EPA form 3510-3. In addition, find the requested topographic map and a blue print of our office and converting facilities.

Also, a letter dated August 14, 1980 where we requested clarification on our type waste.

The forms have been completed to the best of our ability, if you need additional information please let us hear from you.

Respectfully yours,

COLORPAC, INCORPORATED

Edward F. Miller

Edward F. Miller
Vice President
Research & Development

EFM/mc
Attach.
cc: Mr. Grant Newell
Mr. Dennis Buckley

To not file W/RFA

NO ACTION TAKEN
PENDING DECISION ON WITHDRAWAL
BY EPA STAFF
DATE 10/25/82

COLORPAC INCORPORATED · 708 SOUTH AVENUE · FRANKLIN, OHIO 45005 · AREA 513-746-4511 · CINCINNATI-628-4933 · DAYTON-222-5545

October 15, 1982

RECEIVED
OCT 19 1982
WASTE MANAGEMENT BRANCH
EPA REGION V

Mr. William H. Miner, Chief
Technical, Permits, and Compliance Section
RCRA Activities
ATTN: Financial Requirements
P.O. Box A3587
Chicago, Il 60690

Dear Mr. Miner:

SUBJECT: Colorpac, Incorporated OHD058394313 G, TSD, PA

In reply to your Certified letter dated 10-4-82. At the time the law was enacted we at Colorpac, Incorporated did not understand the regulation and now choose to be classified only as a generator and regulated under 40-CFR-262.

We also are in the process of filing a closure plan, as we don't wish to be classified as a TSD site. We have no need to store material longer than 90 days.

Your cooperation in changing our status will be appreciated.

Respectfully yours,

COLORPAC, INCORPORATED

E F Miller

Edward F. Miller
Vice President
Research & Development

EFM/mc
cc: Mr. Thomas B. Golz, RCRA
Mr. Newell, Colorpac, Inc.

10/20/82

COLORPAC INCORPORATED · 708 SOUTH AVENUE · FRANKLIN, OHIO 45005 · AREA 513-746-4511 · CINCINNATI · 628-4933 · DAYTON · 222-5545

August 14,1980

EPA - Region V
RCRA Activities
P.O. Box 7861
Chicago, IL 60680

Gentlemen:

None of the chemicals listed in section C attached are disposed of as single components, but as a still bottom residue obtained from the recovery dirty chemical solvents. The chemical solvent mix is used as a wash up for our rotogravure printing operation, thus generating dirty chemical solvents.

The still bottom, in addition to containing the attached mentioned chemicals will also contain various colored pigments, and ink resin binders. This still bottom residue is ignitable and as you might expect, would vary in composition.

As part of the notification pack (EPA-8700-12), there is a list of EPA hazardous waste numbers and K086 sounds as if we could use this to cover our waste. Your clarification as to what we should report would be appreciated.

We have disposed of this material by sending it to the city of Cincinnati incineration .

I felt the above letter necessary because we found no classification listed for our waste. Your reply will be appreciated.

Respectfully yours,

E. F. Miller

Edward F. Miller
Vice President
Research & Development

EFM/mc
cc: Mr. Grant Newell

COLORPAC INCORPORATED · 708 SOUTH AVENUE · FRANKLIN, OHIO 45005 · AREA 513-746-4511 · CINCINNATI-628-4933 · DAYTON-222-5545

January 10, 1985

Mr. William H. Miner
RCRA Activities
U.S. EPA, Region V
P.O. Box A-3587
Chicago, Illinois 60690-3587

OHD 058 394 313 G, TSD, PA-8

Dear Mr. Miner:

SUBJECT: Request for Change in Status

Please find attached our signed request asking for a change in status from a storage facility to a generator.

We never intended to be a storage facility and in error obtained that status.

Our waste is now stored in a 5000 tank and removed by Chemical Waste Management on a regular basis for reclaiming and return. There is no time, when we store this waste as long as 90 days.

Your cooperation is appreciated.

Respectfully yours,

COLORPAC, INCORPORATED

E. F. Miller

Edward F. Miller
Vice President
Research & Development

EFM/mc
Enclosure
cc: Mr. Grant Newell

F JEST FOR CHANGE IN STATUS TO:

"GENERATOR ACCUMULATING WASTE ON-SITE IN COMPLIANCE WITH 40 CFR 262.34"

(APPLICABLE TO FACILITIES WHICH, AS OF NOVEMBER 19, 1980, HAVE BEEN STORING WASTES IN CONTAINERS AND/OR TANKS ONLY)

Facility Name:	Colorpac, Incorporated
Facility Location:	Franklin, OH 45005
Mailing Address:	PO Box 308
U.S. EPA ID No.:	OHD-058-394-313

1. I certify, in reference to the above-named facility, that a complete and accurate description of the activities currently conducted, for purposes of the Resource Conservation and Recovery Act (RCRA), are those of a generator accumulating waste on-site, in compliance with 40 CFR 262.34. This description of activities shall be considered effective as of 1-10-85 (please type, in above space: today's date, or other appropriate past date)

2. I certify that all hazardous waste which had been stored at this facility for greater than 90 days have been permanently removed, and -- for that portion of the wastes that were present on-site on or after November 19, 1980 -- the manifest requirements of 40 CFR Part 262 have been complied with, and all manifests are on file at this facility, available for inspection by authorized State and Federal officials.

3. I finally certify under penalty of law that I have personally examined, and am familiar with the information submitted in this document and all attachments, and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Signature	Typed Name and Title	Date
Edward F Miller 1/10/85	Edward F. Miller V.P. Director Research & Development	1-10-85

(Please have appropriate official, per 40 CFR 270.11, sign and date)

PLEASE NOTE

We have a new mailing address for all Region V RCRA activities.

RCRA ACTIVITIES
Region V
P.O. Box A3587
Chicago, Illinois 60690-3587

The following RCRA activities should be submitted to the address above:

a. Inquiries on ID numbers;

b. Notification of Hazardous Waste Activity (EPA Form 8700-12);

c. Part A of the RCRA treatment, storage, and/or didposal (TSD) facility permit application, Form 1 (EPA Form 3510-1) and Form 3 (EPA Form 3510-3);

d. Part B of the RCRA TSD facility permit application;

e. Manifest reports (exception, discrepancy and unmanifested waste);

f. Financial responsibility documents; and

g. Annual reports.

You can get information and answers to specific questions relating to Interim Status Standards and the Federal hazardous waste management program in your State by calling (312) 353-2197 and asking for RCRA hazardous waste regulations assistance. Region V has numerous technical staff who are available to help industry comply with the hazardous waste regulations under RCRA. Trained professionals provide accurate, up-to-date general information on the regulations and also answer questions regarding specific problems.

We have also designated State Implementation Officers (SIO) in the Regional Office who are responsible for coordinating the Federal and State efforts in the operation of the Federal hazardous waste management program. If you have questions on how the relationship between USEPA and State Agencies affect your operation, ask for the designated SIO when you call (312) 353-2197.

NOV 2 8 1984

5HW-13

Edward F. Miller, Vice President-
Research and Development
Colorpac, Incorporated
768 South Avenue
Franklin, Ohio 45005

RE: Withdrawal of Part A
(Storage fewer than 90 days)
Facility Name: Colorpac Incorporated
U.S. EPA ID No.: OHD 053-394-313

Dear Mr. Miller:

This is to acknowledge receipt of your October 15, 1982, letter requesting the withdrawal of the Part A Hazardous Waste Permit Application for the referenced facility. The request stated the facility would like to be considered a generator of hazardous waste only, and accumulate those wastes on-site for fewer than 90 days according to 40 CFR 262.34 (enclosed).

Based on the Agency's information, however, the facility has stored hazardous wastes for longer than 90 days at some time since November 19, 1980. Therefore, the facility is subject to the closure requirements in 40 CFR 265 Subpart G. Your obligations under these requirements may be satisfied by completing the enclosed "request for change in status," having it signed by an appropriate individual per 40 CFR 270.11 (enclosed), and submitting it to the following address:

RCRA Activities
U.S. EPA, Region V
P.O. Box A3587
Chicago, Illinois 60690-3587

After our receipt of the properly executed request, we will publicly notice your change in status. Upon completion of the public notice period we will notify you in writing of your regulatory status.

This will eliminate the need for a Resource Conservation and Recovery Act permit at your facility. Please contact Ms. Rebecca Strom at (312) 886-6194, if you have any questions.

Please refer to "Withdrawal of Part A (Storage fewer than 90 days)", in all telephone contacts and correspondence on this matter.

Sincerely yours,

William H. Miner, Chief
Technical, Permits, and Compliance Section

Enclosures (1) 40 CFR 262.34
(2) Request for change in status
(3) 40 CFR 270.11

cc: Tom Carlisle
Ohio Environmental Protection Agency

Cheryl Kaiser
Ohio Environmental Protection Agency

bcc: Rebecca Strom
Lisa Pierard
Part A File

5HW-13:RS:JT:11-27-84

	TYPIST	AUTHOR	SEC'Y #1	SEC'Y #	SEC'Y #	for	SMB	WMD
			CHIEF		CHIEF	CHIEF	CHIEF	DIRECTOR
INITIALS	PB	RLS		DJB		DJB		
DATE	11-28-84	11-28-84				11-28-84		

Please print or type in the unshaded areas only
(fill—in areas are spaced for elite type, i.e., 12 characters/inch).

Form Approved OMB No. 158-R0175

48

FORM 1 GENERAL

U.S. ENVIRONMENTAL PROTECTION AGENCY

GENERAL INFORMATION

Consolidated Permits Program

(Read the "General Instructions" before starting.)

I. EPA I.D. NUMBER

															T/A	C
F	O	H	D	0	5	8	3	9	4	3	1	3				D

LABEL ITEMS

- II. EPA I.D. NUMBER
- III. FACILITY NAME
- V. FACILITY MAILING ADDRESS
- VI. FACILITY LOCATION

PLEASE PLACE LABEL IN THIS SPACE

GENERAL INSTRUCTIONS

If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill—in area below. Also, if any of the preprinted data is absent *(the area to the left of the label space lists the information that should appear)*, please provide it in the proper fill—in area*(s)* below. If the label is complete and correct, you need not complete Items I, III, V, and VI *(except VI-B which must be completed regardless)*. Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.

II. POLLUTANT CHARACTERISTICS

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of **bold—faced** terms.

SPECIFIC QUESTIONS	MARK 'X' YES	NO	FORM ATTACHED	SPECIFIC QUESTIONS	MARK 'X' YES	NO	FORM ATTACHED
A. Is this facility a **publicly owned treatment works** which results in a **discharge** to **waters of the U.S.**? (FORM 2A)		X		B. Does or will this facility *(either existing or proposed)* include a **concentrated animal feeding operation** or **aquatic animal production facility** which results in a **discharge** to **waters of the U.S.**? (FORM 2B)		X	
C. Is this a facility which currently results in **discharges** to **waters of the U.S.** other than those described in A or B above? (FORM 2C)		X		D. Is this a proposed facility *(other than those described in A or B above)* which will result in a **discharge** to **waters of the U.S.**? (FORM 2D)		X	
E. Does or will this facility treat, store, or dispose of **hazardous wastes**? (FORM 3)	X		X	F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X		H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
I. Is this facility a proposed **stationary source** which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an **attainment area**? (FORM 5)		X		J. Is this facility a proposed **stationary source** which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an **attainment area**? (FORM 5)		X	

III. NAME OF FACILITY

1 SKIP: COLORPAC, INCORPORATED

IV. FACILITY CONTACT

A. NAME & TITLE *(last, first, & title)*	B. PHONE *(area code & no.)*		
2 MILLER, E.D., V.P., RESEARCH & DEVEL.	513	746	4511

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX

3 708 SOUTH AVENUE

B. CITY OR TOWN	C. STATE	D. ZIP CODE
4 FRANKLIN	OH	45005

RECEIVED 11/9/81

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER

5 708 SOUTH AVENUE FRANKLIN OH

B. COUNTY NAME

WARREN

C. CITY OR TOWN	D. STATE	E. ZIP CODE	F. COUNTY CODE *(if known)*
6 FRANKLIN	OH	45005	

CONTINUE ON REVERSI

CONTINUED FROM THE FRONT

VII. SIC CODES (4-digit, in order of priority)

A. FIRST	B. SECOND
2754 (specify) GRAVURE PRINTING	2641 (specify) ? COATING
C. THIRD	**D. FOURTH**
2751 (specify) FLEXOGRAPHIC PRINTING	(specify)

VIII. OPERATOR INFORMATION

A. NAME: COLORPAC, INCORPORATED

B. Is the name listed in Item VIII-A also the owner? ☐ YES ☒ NO

C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)
F = FEDERAL, S = STATE, P = PRIVATE, M = PUBLIC (other than federal or state), O = OTHER (specify)
P (specify)

D. PHONE (area code & no.): 513 746 4511

E. STREET OR P.O. BOX: 708 SOUTH AVENUE

F. CITY OR TOWN: FRANKLIN

G. STATE: OH

H. ZIP CODE: 45005

IX. INDIAN LAND

Is the facility located on Indian lands? ☐ YES ☒ NO

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water): N	**D. PSD** (Air Emissions from Proposed Sources): P
B. UIC (Underground Injection of Fluids): U	**E. OTHER** (specify): Z — SEE LIST (specify)
C. RCRA (Hazardous Wastes): R	**E. OTHER** (specify): (specify)

XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property bounderies. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

XII. NATURE OF BUSINESS (provide a brief description)

Colorpac Incorporated major function is the rotogravure and flexographic printing of a very wide and diversified line of flexible package wrappers and labels. Our product line is of a highly technical nature formulated to run on high speed production packaging and wrapping equipment. To augment our printing operation we laminate our own foil and various packaging films to paper and board, in addition, we hot melt coat a good percentage of our printed material with heat seal coatings. We manufacture our own printing inks and coatings.

XIII. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print)	B. SIGNATURE	C. DATE SIGNED
Edward Miller, V.P. of R.& D.	Edward Miller	10-21-80

COMMENTS FOR OFFICIAL USE ONLY

Please print or type in the unshaded areas only
(fill—in areas are spaced for elite type, i.e., 12 characters/inch).

48

Form Approved OMB No. 158-S80004

FORM 3 RCRA

EPA

U.S. ENVIRONMENTAL PROTECTION AGENCY

HAZARDOUS WASTE PERMIT APPLICATION

Consolidated Permits Program

(This information is required under Section 3005 of RCRA.)

I. EPA I.D. NUMBER

S												T/A	C
F	O	H	D	0	5	8	3	9	4	3	1	3	1

FOR OFFICIAL USE ONLY

APPLICATION APPROVED	DATE RECEIVED (yr., mo., & day)	COMMENTS

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below *(mark one box only)* to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION *(place an "X" below and provide the appropriate date)*

[X] 1. EXISTING FACILITY *(See instructions for definition of "existing" facility. Complete item below.)*

[ ] 2. NEW FACILITY *(Complete item below.)*

FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED *(use the boxes to the left)*

C	YR.	MO.	DAY
8	62	01	01

FOR NEW FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR IS EXPECTED TO BEGIN

YR.	MO.	DAY

B. REVISED APPLICATION *(place an "X" below and complete Item I above)*

? [X] 1. FACILITY HAS INTERIM STATUS

[ ] 2. FACILITY HAS A RCRA PERMIT

III. PROCESSES — CODES AND DESIGN CAPACITIES

A. PROCESS CODE — Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process *(including its design capacity)* in the space provided on the form *(Item III-C)*.

B. PROCESS DESIGN CAPACITY — For each code entered in column A enter the capacity of the process.

1. AMOUNT — Enter the amount.
2. UNIT OF MEASURE — For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:		
CONTAINER *(barrel, drum, etc.)*	S01	GALLONS OR LITERS
TANK	S02	GALLONS OR LITERS
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS
Disposal:		
INJECTION WELL	D79	GALLONS OR LITERS
LANDFILL	D80	ACRE-FEET *(the volume that would cover one acre to a depth of one foot)* OR HECTARE-METER
LAND APPLICATION	D81	ACRES OR HECTARES
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Treatment:		
TANK	T01	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
OTHER *(Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)*	T04	GALLONS PER DAY OR LITERS PER DAY

UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G
LITERS	L
CUBIC YARDS	Y
CUBIC METERS	C
GALLONS PER DAY	U
LITERS PER DAY	V
TONS PER HOUR	D
METRIC TONS PER HOUR	W
GALLONS PER HOUR	E
LITERS PER HOUR	H
ACRE-FEET	A
HECTARE-METER	F
ACRES	B
HECTARES	Q

EXAMPLE FOR COMPLETING ITEM III *(shown in line numbers X-1 and X-2 below)*: A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

S														T/A	C
C	D	U	P												1

LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT (specify)	B. PROCESS DESIGN CAPACITY 2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY	LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT	B. PROCESS DESIGN CAPACITY 2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY
X-1	S02	600	G		5				
X-2	T03	20	E		6				
1	S01	15,600	G		7				
2					8				
3					9				
4					10				

RECEIVED 11/9/81

RECEIVED NOV 01

WASTE MANAGEMENT SECTION

OCT 20 1980

Continued from the front.

III. PROCESSES *(continued)*

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES *(code "T04")*. FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

IV. DESCRIPTION OF HAZARDOUS WASTES

A. EPA HAZARDOUS WASTE NUMBER – Enter the four–digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four–digit number*(s)* from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. ESTIMATED ANNUAL QUANTITY – For each **listed waste** entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each **characteristic** or **toxic contaminant** entered in column A estimate the total annual quantity of all the non–listed waste*(s)* that will be handled which possess that characteristic or contaminant.

C. UNIT OF MEASURE – For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:
   For listed hazardous waste: For each **listed** hazardous waste entered in column A select the code*(s)* from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.
   For non–listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code*(s)* from the list of process codes contained in Item III to indicate **all** the processes that will be used to store, treat, and/or dispose of all the non–listed hazardous wastes that possess that characteristic or toxic contaminant.
   Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code*(s)*.

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER – Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B,C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV *(shown in line numbers X-1, X-2, X-3, and X-4 below)* – A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non–listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				included with above

Continued from page 2.

NOTE: Photocopy this page before completing if you h... more than 26 wastes to list.

Form Approved OMB No. 158-S80004

EPA I.D. NUMBER (enter from page 1)		FOR OFFICIAL USE ONLY	
S	W O H D 0 5 8 3 9 4 3 1 3	S	DUP
T/A		T/A	2
C	1	C	DUP

II. DESCRIPTION OF HAZARDOUS WASTES (continued)

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
1	F 0 0 3	95,000 lbs.	P	S01	
2	F 0 0 5	NOTE: SEE OUR LETTER TO EPA-CHICAGO DATED 8-14-80			
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					
13					
14					
15					
16					
17					
18					
19					
20					
21					
22					
23					
24					
25					
26					

Continued from the front.

IV. DESCRIPTION OF HAZARDOUS W[illegible]ES *(continued)*

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

EPA I.D. NO. *(enter from page 1)*

S													T/A	C
F	O	H	D	0	5	8	3	9	4	3	1	3		6
1	2											13	14	15

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility *(see instructions for more detail).*

VI. PHOTOGRAPHS

All existing facilities must include photographs *(aerial or ground–level)* that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas *(see instructions for more detail).*

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE *(degrees, minutes, & seconds)*							LONGITUDE *(degrees, minutes, & seconds)*						
3	9	3	3	0 5 0		N	0 8 5	1 8	0 5 5				W
65	66	67	68	69 - 71			72 - 74	75 76	77 - 79				

VIII. FACILITY OWNER

[X] A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER	2. PHONE NO. *(area code & no.)*
C E	
15 16 - 55	56 - 58 59 - 61 62 - 65

3. STREET OR P.O. BOX	4. CITY OR TOWN	5. ST.	6. ZIP CODE
C F	C G		
15 16 - 45	15 16 - 40	41 42	47 - 51

IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME *(print or type)*	B. SIGNATURE	C. DATE SIGNED
Edward Miller	Edward Miller	11/2/81

X. OPERATOR CERTIFICATION

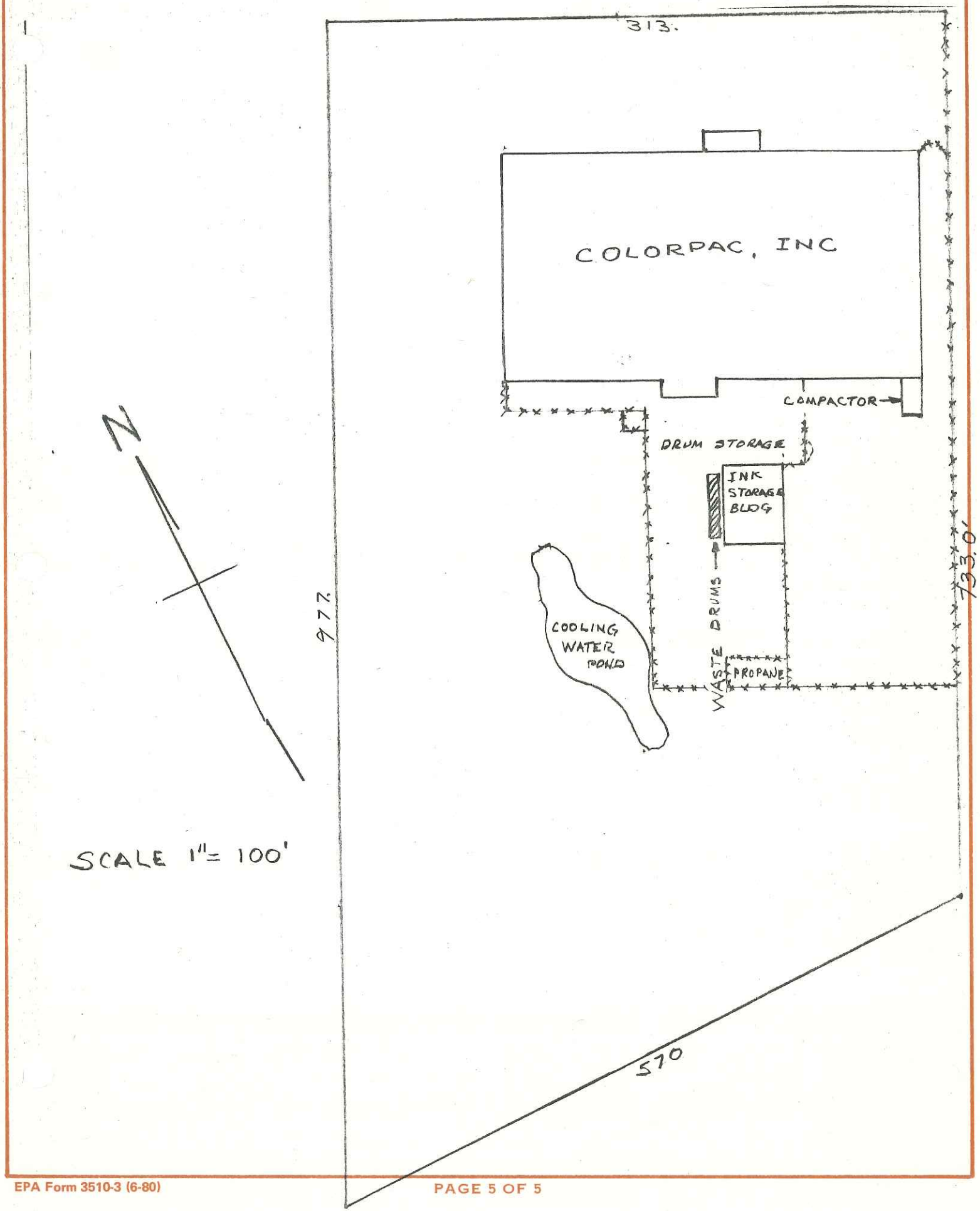
I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

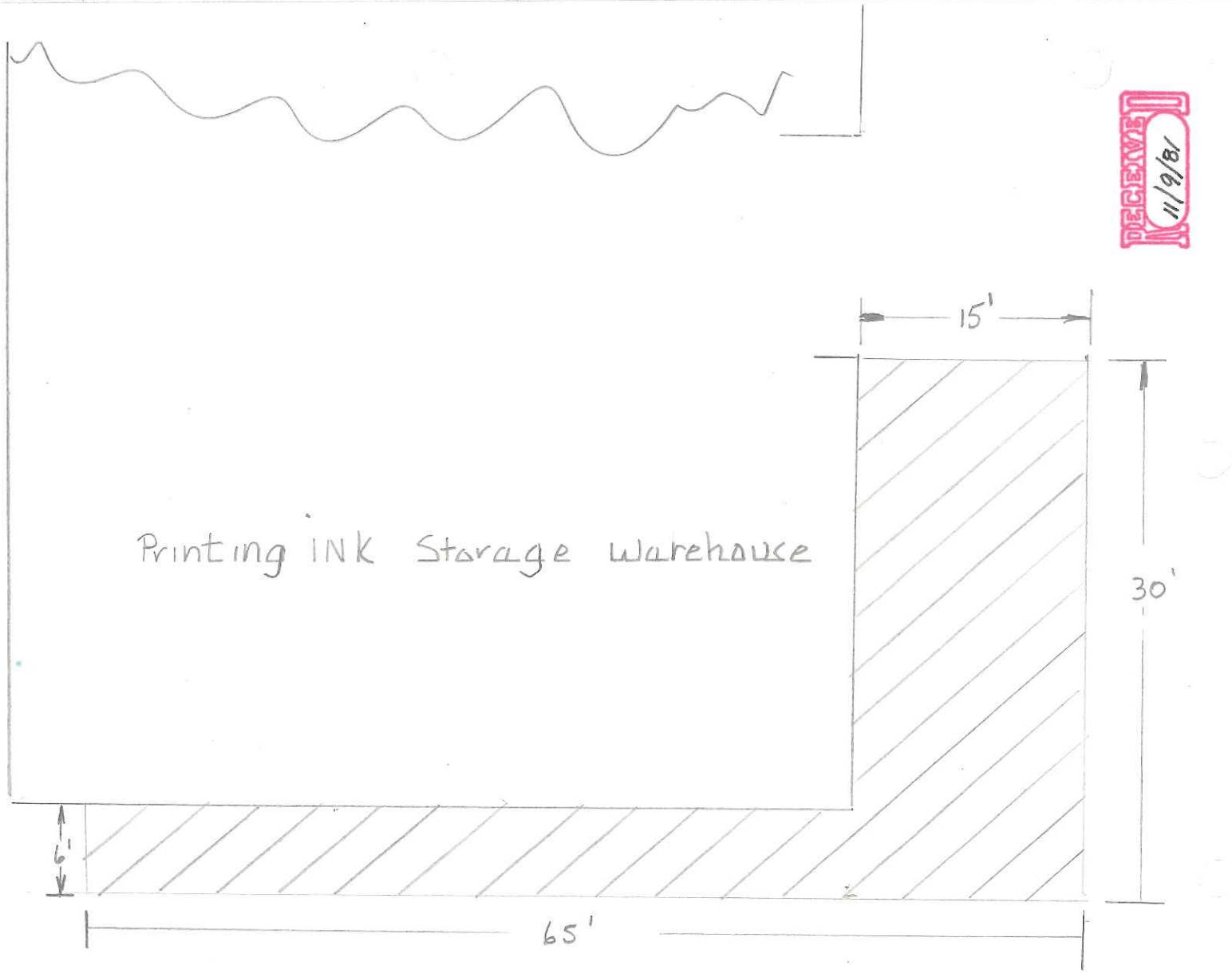
A. NAME *(print or type)*	B. SIGNATURE	C. DATE SIGNED

Continued from page 4.

Form Approved OMB No. 158-S80004

V. FACILITY DRAWING *(see page 4)*





Colorpac Inc 708 South Ave. Franklin, Ohio 45005

_ Outside Hasardous Waste Storage
– 312 55 gal Drums (15,600 gal's) Maximum Storage

11/2/81
Etm


Storage
Area along
side this warehouse
see attached
sketch

COLORPAC INCORPORATED · 708 SOUTH AVENUE · FRANKLIN, OHIO 45005 · AREA 513-746-4511 · CINCINNATI · 628-4933 · DAYTON · 222-5545

October 15, 1982

Mr. Thomas B. Golz
RCRA Activities
ATTN: Financial Requirements
P.O. Box A3587
Chicago, Il 60690

Dear Mr. Golz:

SUBJECT: Colorpac, Incorporated OHD058394313 G TSD, PA

As Regional Administrator, I am writing you to file a closure plan as a storage facility under 40 CFR-265. We wish only to be classified as a generator under 40-CFR-262 and understand that no hazardous waste material is to be on our facility longer than 90 days. We presently are using Solvent Resource and Recovery Company in West Carrolton, Ohio as our means of disposing of our waste materials. They are only 10 to 15 miles from our plant and with several days notice can be in our plant and remove any accumulation of waste we have generated.

Your cooperation in changing our status is appreciated.

Respectfully yours,

COLORPAC, INCORPORATED

E F Miller

Edward F. Miller
Vice President
Research & Development

EFM/mc
cc: Mr. William H. Miner, RCRA Activities
Mr. Dave Duell, Ohio EPA
Mr. Grant Newell, President, Colorpac, Incorporated

COLORPAC INCORPORATED · 708 SOUTH AVENUE · FRANKLIN, OHIO 45005 · AREA 513-746-4511 · CINCINNATI-628-4933 · DAYTON-222-5545

October 15, 1982

Mr. William H. Miner, Chief
Technical, Permits, and Compliance Section
RCRA Activities
ATTN: Financial Requirements
P.O. Box A3587
Chicago, Il 60690

Dear Mr. Miner:

SUBJECT: Colorpac, Incorporated OHD058394313 G, T, D, PA

In reply to your Certified letter dated 10-4-82. At the time the law was enacted we at Colorpac, Incorporated did not understand the regulation and now choose to be classified only as a generator and regulated under 40-CFR-262.

We also are in the process of filing a closure plan, as we don't wish to be classified as a TSD site. We have no need to store material longer than 90 days.

Your cooperation in changing our status will be appreciated.

Respectfully yours,

COLORPAC, INCORPORATED

Edward F. Miller
Vice President
Research & Development

EFM/mc
cc: Mr. Thomas B. Golz, RCRA
Mr. Newell, Colorpac, Inc.

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:

5HW-TUB

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Ed Miller
Colorpac Inc.
708 So. Avenue
Franklin, Ohio 45005

RE: Colorpac, Inc.
OHD058394313

Dear Mr. Miller:

The referenced company is a hazardous waste treatment, storage, or disposal facility subject to the Resource Conservation and Recovery Act (RCRA) as amended. Federal regulations (40 CFR Part 265 Subpart H) require that such facilities shall provide to the United States Environmental Protection Agency (U.S. EPA) proof of financial assurance for closure by July 6, 1982, and proof of liability coverage by July 15, 1982 (40 CFR 265.143 and 265.147 respectively).

To date U.S. EPA has not received these proofs; consequently, the facility is in violation of the requirements of 40 CFR Part 265 Subpart H. The Agency considers these financial responsibility proofs as significant requirements of the hazardous waste regulations. Failure to provide these required proofs within 30 days of receipt of this notice may subject the facility to enforcement action. RCRA provides for civil penalties up to $25,000 per violation. Please forward the financial responsibility proofs to:

RCRA Activities
ATTN: Financial requirements
P.O. Box A3587
Chicago, Il 60690

Mr. Thomas B. Golz, at (312) 886-4023, can provide additional information concerning this notice.

Sincerely,

William H. Miner

William H. Miner, Chief
Technical, Permits, and Compliance Section

cc: Tegtmeyer - OEPA

C.2 Compliance/ Enforcement

Land and Chemicals Division
RCRA Branch
Inspection Letter Signoff

Type of Document:
- ☐ Notice of Violation and Inspection Report/Checklist
- ☐ No Violation Letter and Inspection Report/Checklist
- ☐ Letter of Acknowledgment
- ☐ Information Request
- ☐ Return to Compliance

Facility Name and Location and Id: SONOCO Flexible Packaging
FRANKLIN, Ohio
OHD 058 394 313

Assigned Staff: J Duncan **Phone:** 64555

Name	Signature	Date
Author		02/05/09
Regional Counsel		
Section Chief	PL	2-10-09
Branch Chief	Willa B. Harris	2/11/09

Directions/Request for Clerical Support:
After the Section Chief signs this sheet and original letter:
1. Date stamp the cover letter;
2. Make four copies of the contents of this folder:
   - One copy for the assigned staff;
   - One copy for the section file; and
   - One copy for the official file; Note: original inspection report goes into file room.
3. Make any additional copies for cc's or bcc's.
4. Mail the original certified mail and distribute office copies and cc's and bcc's.

Once the certified mail receipt is returned:
5. File the certified mail receipt (green card), with this sign-off sheet and the official file copy, and take to 7th floor RCRA file room.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

FEB 11 2009

REPLY TO THE ATTENTION OF:
LR-8J

Tim Nuckols, Plant Manager
Sonoco Flexible Packaging
708 South Avenue
Franklin, Ohio 45005

Re: Compliance Evaluation Inspection
EPA I.D. No.: OHD 058 394 313

Dear Mr. Nuckols:

On January 15, 2009, representatives of the U. S. Environmental Protection Agency and Ohio Environmental Protection Agency (Ohio EPA) inspected Sonoco Flexible Packaging located in Franklin, Ohio. The purpose of the inspection was to evaluate your site's compliance with the applicable requirements of the Resource Conservation and Recovery Act (RCRA). Specifically, EPA and Ohio EPA evaluated compliance with hazardous waste, used oil, and universal waste regulations set forth at the Ohio Administrative Code 3745-52-34 and Code of Federal Regulations. Enclosed please find a copy of EPA's inspection report.

EPA has not identified any violations of the requirements under evaluation. This determination does not limit the applicability of the requirements evaluated, other RCRA regulations, or regulations under other environmental statutes. EPA and Ohio EPA will continue to evaluate your site's compliance in the future.

Because EPA determined that you were in compliance with RCRA during this inspection, we have enclosed a Performance Track informational brochure. EPA's National Environmental Performance Track program is a public-private partnership that recognizes and drives environmental excellence. The program encourages public and private facilities with strong environmental records to continuously improve their environmental performance beyond regulatory requirements while working collaboratively within their communities. More information on this program can be found at: http://www.epa.gov/performancetrack/.

If you have any questions or concerns regarding this inspection and letter, please contact Duncan Campbell, of my staff, at 312-886-4555.

Sincerely,

Willie H. Harris

Willie H. Harris, P.E.
Chief, RCRA Branch
Land and Chemicals Division

Enclosures

cc: Larry Dickerson, Ohio EPA, Southwest District

U.S. EPA REGION 5
WASTE, PESTICIDES AND TOXICS DIVISION
ENFORCEMENT AND COMPLIANCE ASSURANCE BRANCH

RCRA COMPLIANCE EVALUATION INSPECTION REPORT

FACILITY NAME: **Sonoco Flexible Packaging**

FACILITY U.S. EPA ID NO.: **OHD 058 394 313**
FACILITY ADDRESS: 708 South Avenue
Franklin, Ohio 45005
sonoco.com

FACILITY REPRESENTATIVE: Tim Nuckols,
Plant Manager

Dennis Sveinson
Production and Maintenance Manager

U.S. EPA REPRESENTATIVE: Duncan Campbell
U.S. EPA
RCRA Branch, Compliance Section 2
77 West Jackson Blvd (LR-8J)
Chicago, Illinois 60604
(312) 886-4555
campbell.duncan@epa.gov

DATE(S) OF INSPECTION: January 15, 2009

NAICS CODE: 323112 Flexography Packaging

Prepared by _____ Date 02/10/2009
Duncan Campbell

Received by _____ Date 2-16-09
Paul Little

Purpose of Inspection

This inspection was an evaluation of Sonoco Flexible Packaging's compliance with hazardous waste regulations found at OAC 3745-52-34 and the Code of Federal Regulations. Duncan Campbell performed this inspection with Larry Dickerson of Ohio EPA. This inspection was a U.S. EPA lead RCRA Compliance Evaluation Inspection (CEI).

Inspectors
Duncan Campbell, U.S. EPA
Larry Dickerson, Ohio EPA

Site Participants
Tim Nuckols, Plant Manager
Dennis Sveinson, Production and Maintenance Manager

Introduction

On January 15, 2009, the inspectors arrived at the site at approximately 9:30 AM. We introduced ourselves, presented our inspector credentials and described the purpose of the inspection and the process by which we intended to conduct the inspection. Messer's Nuckols and Sveinson provided us with a verbal description of the site. After we had completed the site tour Messer Sveinson provided us with the records we requested for review.

Duncan Campbell did not provide Messer's Nuckols and Sveinson with a Small Business Resource information sheet because Sonoco is not a Small Business.

Site Description

In 1999, Sonoco purchased this facility from Graphic Packaging. The facility original owner first notified as a generator of hazardous waste in August of 1980. It then submitted a Part A and was granted Interim Status by U.S. EPA. The facility operated with interim status until 1985 at which time the sole regulated unit, a 15,600 gallon container storage area, was certified as being "clean closed."

This facility specializes in flexography printing utilized in consumer product packaging. The processes are regulated by the U.S. Food and Drug Agency and require a third-party certification. Sonoco recently renewed its certification after successfully passing an audit.

The facility has one press [K009] and two [K008 and K010] extrusion coating laminators. Both laminators apply a two-part adhesive that contains a catalyst. Manufacturing operations occur in two segregated buildings with a third building serving as the 90-day accumulation area.

Site Tour

We toured the site identifying where waste is generated and observing satellite accumulation areas, the less than 90-day accumulation container storage area and emergency equipment. Duncan Campbell disclosed to Messer's Nuckols and Sveinson that he had a camera in his possession but he ended up not taking photographs of the process areas, the waste management

operations or the less than 90-day accumulation area because he did not observe any noncompliance with OAC 3745-52-34 or the CFR.
The following areas were inspected:

#2 Press [K009] Room - there were two satellite containers positioned within the Press Room. The first was used to collect absorbents and rags generated from cleaning up the press after a production run. It was labeled as "Hazardous Waste" and was kept closed when the operator was not adding spent materials. Once this satellite is filled, it is dated, with the start accumulation date, and taken to the 90-day accumulation area. The second is used to collect inks that have been removed from the squeegee blades at various points along the press. This satellite was also labeled "Hazardous Waste" and observed to be closed. Once filled, these spent ink containers are dated with the start accumulation date and moved to the 90-day accumulation area.

K008 - contains a Black and Clawson extrusion laminator. There were two satellite containers staged within this room. The first was dedicated to managing the spent adhesive that is cleaned from the equipment. It was observed to be labeled with the words "Hazardous Waste" and closed. The adhesive contains a catalyst which prevents it from being reclaimed. Once the containers of spent adhesive become full they are taken to the 90-day accumulation area. The second satellite was dedicated to the spent solvents generated from cleaning the laminator. Sonoco uses a solvent blend containing ethyl acetate. Once this satellite is filled it is taken to the solvent still located within the Pre-Mix Room (PMR).

K010 – contains the other Black and Clawson extrusion laminator. Again, there were two satellite containers within this room. The first was dedicated to the management of spent adhesive that had been removed from the laminator. As with the K008 laminator, the adhesive contains a catalyst preventing it from being reclaimed. The satellite was observed to be labeled with the words "Hazardous Waste" and in the closed position. When the satellite is full it is taken to the 90-day accumulation area. The second satellite is used to manage spent solvent generated from the cleaning of the laminator. This satellite was observed closed and labeled as "Hazardous Waste." As with the satellite in K008 it is also taken to PMR and run through the solvent still. After Sonoco has reclaimed the spent ethyl acetate it is returned to K008 or K010 and used for cleaning again.

PMR – No production takes place in this room. There numerous satellite containers located within PMR. The first was dedicated to empty aerosol cans; the second was dedicated to collecting still-bottoms that are removed from the solvent still; the third was for absorbents and rags used to perform clean up in the PMR; the fourth was for canister filters; and finally, the fifth was for water-based ink cleanups. All satellites were marked with words "Hazardous Waste" and were observed closed. All of these satellites are removed to the 90-day accumulation area once they have been filled.

Lubricating Room – No waste is generated in this area. Sonoco uses this room to store its fluorescent bulbs and used oil. The fluorescent bulbs were contained within cardboard boxes that had been labeled "Universal Waste" and dated with a start date. A 55-gallon container of Used Oil was also observed in this room. The used oil was labeled with the words "Used Oil" and was closed.

Ink Storage Room – Sonoco performs its mixing of inks in the mixing room. Drums of raw

materials are stored in a large room adjacent to the mix room. There were two satellite containers in the mix room. The first one contained inks and spent solvents from the mixing of inks. The second satellite manages the adhesive, solvent and inks drained from 55-gallon drums. Once these drums have been drained they are determined to be "RCRA empty." Empty drums are returned to the drum conditioner.

90-day Accumulation Area – All hazardous waste is accumulated in a building approximately 200 feet from the Ink Room. There are four waste streams that are routinely generated at Sonoco: 1) solvent based adhesive; 2) absorbents containing inks and solvents; 3) still-bottoms from the solvent still and 4) water-based solvents.

Approximately twenty 55-gallon containers of hazardous waste were labeled "Hazardous Waste," dated with a start accumulation date and were secured closed. The building was equipped with a fire suppression system, a fire extinguisher and spill equipment. All employees who enter this building are required to have a functional two-way radio on their person. Sonoco maintains a weekly inspection log that records the condition of the hazardous waste containers and the readiness of the emergency equipment stored in an oversized container.

1. Sonoco generates used oil from the operation of its machinery and stores it in 55-gallon containers. The one container observed in the Lubricating Room was labeled "Used Oil" and was stored closed.

2. Sonoco collects all of its lamps and manages them in cardboard boxes as "Universal Waste." The boxes were labeled and dated.

3. Sonoco reclaims the ethyl acetate in a solvent still located in PMR.

4. Sonoco maintained sufficient aisle space in its 90-day accumulation area. It also staged the 55-gallon containers such that their labels could easily be inspected.

Record Review

The inspectors reviewed Sonoco's manifests, waste characterizations and the profiles they had established with their waste vendors, the 2007 annual report, personnel training records, weekly inspection reports of the containers in their less than 90-day accumulation area and an Emergency, Contingency and Spill Prevention and Preparedness plans. Sonoco was found to be in compliance with these portions of the generator recordkeeping provisions. Duncan Campbell completed the applicable checklist after the inspection. See Attachment A.

ATTACHMENT A:
Ohio EPA's Large Quantity Generator Inspection Report
Subpart CC checklist for container storage

Sonoco Flexible Packaging
708 South Avenue
Franklin, Ohio 45005
OHD 058 394 313
LARGE QUANTITY GENERATOR CHECLIST

GENERAL REQUIREMENTS

1. Have all wastes generated at the facility been adequately evaluated? [3745-52-11] Yes √ No ☐ N/A ☐

2. Are records of waste determination being kept for at least 3 years?[3745-52-40(C)] Yes √ No ☐ N/A ☐

3. Has the generator obtained a U.S. EPA identification number? [3745-52-12] Yes √ No ☐ N/A ☐

4. Were annual reports filed with Ohio EPA on or before March 1st? [3745-52-41(A)] Yes √ No ☐ N/A ☐

5. Are annual reports kept on file for at least 3 years?[3745-52-40(B)] Yes √ No ☐ N/A ☐

6. Has the generator transported or caused to be transported hazardous waste to **other** than a facility authorized to manage the hazardous waste? [ORC 3734.02(F)] Yes ☐ No √ N/A ☐

7. Has the generator disposed of hazardous waste **on-site without a permit** or at another facility other than a facility authorized to dispose of the hazardous waste? [ORC 3734.02(E) & (F)] Yes ☐ No √ N/A ☐

8. Does the generator accumulate hazardous waste? Yes √ No ☐ N/A ☐

9. Has the generator accumulated hazardous waste on-site in excess of 90 days without a permit or an extension from the director ORC §3734.02 (E) & (F)? Yes ☐ No √ N/A ☐

NOTE: If F006 waste is generated and accumulated for > 90 days and is recycled see 3745-52-34(G) & (H).

10. Does the generator treat hazardous waste? [ORC 3734.02(E)&(F)] Yes ☐ No √ N/A ☐

11. Does the generator export hazardous waste? I Yes ☐ No √ N/A ☐

MANIFEST REQUIREMENTS

12. Have all hazardous wastes shipped off-site been accompanied by a manifest? (U.S. EPA Form 8700-22) [3745-52-20(A)] Yes √ No ☐ N/A ☐

13. Have items (1) through (20) of each manifest been completed? [3745-52-20(A)] Yes √ No ☐ N/A ☐

oes each manifest designate at least one facility which is permitted to handle the waste? Yes √ No ☐ N/A ☐
[3745-52-20(B)]

15. If the transporter was unable to deliver a shipment of hazardous waste to the designated facility did the generator designate an alternate TSD facility or give the transporter instructions to return the waste? [3745-52-20(D)] Yes ☐ No ☐ N/A √

16. Have the manifests been signed by the generator and initial transporter? [3745-52-23(A)(1) & (2)] Yes √ No ☐ N/A ☐

17. If the generator did not receive a return copy of each completed manifest within 35 days of the waste being accepted by the transporter did the generator contact the transporter and/or TSD facility to check on the status of the waste? [3745-52-42(A)(1)] Yes ☐ No ☐ N/A √

18. If the generator has not received the manifest within 45 days, did the generator file an exception report with Ohio EPA? [3745-52-42(A)(2)] Yes ☐ No ☐ N/A √

19. Are signed copies of all manifests and any exception reports being retained for at least three years? [3745-52-40] Yes √ No ☐ N/A ☐

PERSONNEL TRAINING

20. Does the generator have a training program which teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to their positions? [3745-65-16(A)(2)] Yes √ No ☐ N/A ☐

21. Does the personnel training program, at a minimum, include instructions to ensure that facility personnel are able to respond effectively to emergencies involving hazardous waste by familiarizing them with emergency procedures, emergency equipment and emergency systems (where applicable)? [3745-65-16(A)(3)(a-f)] Yes √ No ☐ N/A ☐

22. Is the personnel training program directed by a person trained in hazardous waste management procedures? [3745-65-16(A)(2)] Yes √ No ☐ N/A ☐

23. Do new employees receive training within six months after the date of hire (or assignment to a new position)? [3745-65-16(B)] Yes √ No ☐ N/A ☐

24. Does the generator provide annual refresher training to employees? [3745-65-16(C)] Yes √ No ☐ N/A ☐

25. Does the generator keep records and documentation of:
    a. Job titles [3745-65-16D(1)]? Yes √ No ☐ N/A ☐
    b. Job descriptions [3745-65-16D(2)]? Yes √ No ☐ N/A ☐
    c. Type and amount of training given to each person[3745-65-16D(3)]? Yes √ No ☐ N/A ☐
    d. Completed training or job experience required [3745-65-16D(4)]? Yes √ No ☐ N/A ☐

26. Are training records for current personnel kept until closure of the facility and are training records for former employees kept for at least three years from the date the employee last worked at the facility? [3745-65-16(E)] Yes √ No ☐ N/A ☐

CONTINGENCY PLAN

27. Does the owner/operator have a contingency plan to minimize hazards to human health or the environment from fires, explosions or any unplanned release of hazardous waste? [3745-65-51(A)] Yes √ No ☐ N/A ☐

28. Does the plan describe the following:

a. Actions to be taken in response to fires, explosions or any unplanned release of hazardous waste [3745-65-52(A)]? Yes √ No ☐ N/A ☐

b. Arrangements with emergency authorities [3745-65-52(C)]. Yes √ No ☐ N/A ☐

c. A current list of names and telephone numbers (office and home) of all persons qualified to act as emergency coordinator? [3745-65-52(D)] Yes √ No ☐ N/A ☐

d. A list of all emergency equipment, including: location, a physical description and brief outline of capabilities? [3745-65-52(E)] Yes √ No ☐ N/A ☐

e. An evacuation plan for facility personnel where there is possibility that evacuation may be necessary? [3745-65-52(F)] Yes √ No ☐ N/A ☐

29. Is a copy of the plan (plus revisions) kept on-site and been given to all emergency authorities that may be requested to provide emergency services? [3745-65-53 (A) & (B)] Yes √ No ☐ N/A ☐

30. Has the generator revised the plan in response to facility, equipment and personnel changes,? [3745-65-54] Yes √ No ☐ N/A ☐

31. Is an emergency coordinator available at all times (on-site or on-call)? [3745-65-55] Yes √ No ☐ N/A ☐

NOTE: The emergency coordinator shall be throughly familiar with: (a) all aspects of the facility's contingency plan: (b) all operations and activities at the facility; (c) the location and characteristics of waste handled; (d) the location of all records within the facility; (e) facility layout; and (f) shall have the authority to commit the resources needed to implement provisions of the contingency plan.

EMERGENCY PROCEDURES

32. Has there been a fire, explosion or release of hazardous waste or hazardous waste constituents since the last inspection? Yes ☐ No √ N/A ☐

NOTE: OAC 3745-65-51(b) requires that the contingency plan be implemented immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents, which could threaten human health and the environment.

PREPAREDNESS AND PREVENTION

33. Is the facility operated to minimize the possibility of fire, explosion, or any unplanned release of hazardous waste? [3745-65-31] Yes √ No ☐ N/A ☐

34. Does the generator have the following equipment at the facility, if it is required due to actual hazards associated with the waste:

a. Internal communications or alarm system? [3745-65-32(A)] Yes √ No ☐ N/A ☐

b. Emergency communication device? [3745-65-32(B)] Yes √ No ☐ N/A ☐

c. Portable fire control, spill control and decon equipment? [3745-65-32(C)] Yes √ No ☐ N/A ☐

d. Water of adequate volume/pressure per documentation or facility rep? [3745-65-32(D)] Yes √ No ☐ N/A ☐

NOTE: Verify that the equipment is listed in the contingency plan.

35. Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency? [3745-65-33] Yes √ No ☐ N/.

36. Are emergency equipment tests (inspections) recorded in a log or summary? [3745-65-33] Yes √ No ☐ N/A ☐

37. Do personnel have immediate access to an internal alarm or emergency communication device when handling hazardous waste (unless the device is not required under 3745-65-32)? [3745-65-34(A)] Yes √ No ☐ N/A ☐

38. If there is only one employee on the premises, is there immediate access to a device (ex.phone, hand held two-way radio) capable of summoning external emergency assistance? (Unless not required under 3745-65-32) [3745-65-34(B)] Yes √ No ☐ N/A ☐

39. Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35] Yes ☐ No ☐ N/A √

40. Has the generator attempted to familiarize emergency authorities with possible hazards and facility layouts? [3745-65-37(A)] Yes √ No ☐ N/A ☐

41. Where authorities have declined to enter into arrangements or agreements, has the generator documented such a refusal? [3745-65-37(B)? Yes ☐ No ☐ N/A √

SATELLITE ACCUMULATION AREA REQUIREMENTS

42. Does the generator ensure that satellite accumulation area(s):
    a. Are at or near a point of generation? [3745-52-34(C)(1)] Yes ☐ No ☐ N/A √
    b. Are under the control of the operator of the process generating the waste? [3745-52-34(C)(1)] Yes ☐ No ☐ N/A √
    c. Do not exceed a total of 55 gallons of hazardous waste per waste stream? [3745-52-34(C)(1)] Yes ☐ No ☐ N/A √
    d Containers are closed, in good condition and compatible with wastes stored in them?[3745-52-34(C)(1)(a)] Yes ☐ No ☐ N/A √
    e Containers are marked with words "Hazardous Waste" or other words identifying the contents? [3745-52-34(C)(1)(b)] Yes ☐ No ☐ N/A √

43. Is the generator accumulating hazardous waste(s) in excess of the amounts listed in the preceding question? Yes ☐ No ☐ N/A √

NOTE: The satellite accumulation area is limited to 55 gallons of hazardous waste accumulated from a distinct point of generation in the process under the control of the operator of the process generating the waste (less then 1 quart for acute hazardous waste). There could be individual waste streams accumulated in an area from different points of generation.

USE AND MANAGEMENT OF CONTAINERS IN <90 DAY ACCUMULATION AREAS

44. Has the generator marked the 20 cubic yard roll-off box with the words "Hazardous Waste?" [3745-52-34(A)(3)] Yes √ No ☐ N/A ☐

45. Is the accumulation date on each container? [3745-52-34(A)(2)] Yes √ No ☐ N/A

46. Are hazardous wastes stored in containers which are:

a. Closed (except when adding/removing wastes)? [3745-66-73(A)]	Yes	√	No	☐	N/A	☐
b. In good condition? [3745-66-71]	Yes	√	No	☐	N/A	☐
c. Compatible with wastes stored in them? [3745-66-72]	Yes	√	No	☐	N/A	☐
d. Handled in a manner which prevents rupture/leakage? [3745-66-73(B)]	Yes	√	No	☐	N/A	☐

47. Is the container accumulation areas(s) inspected weekly? [3745-66-74] Per ORC§1.44(A)	Yes	√	No	☐	N/A	☐
Note: "Week" means 7 consecutive days.						
a. Are inspections recorded in a log or summary? [3745-66-74]	Yes	√	No	☐	N/A	☐
48. Are containers of ignitable or reactive wastes located at least 50 feet (15 meters) from the facility's property line? [3745-66-76]	Yes	√	No	☐	N/A	
49. Are containers of incompatible wastes stored separately from each other by means of a dike, berm, wall or other device? [3745-66-77(C)]	Yes	☐	No	☐	N/A	√
50. If the generator places incompatible wastes, or incompatible wastes and materials in the same container, is it done in accordance with 3745-65-17(B)? [3745-66-77(A)]	Yes	☐	No	☐	N/A	√
51. If the generator places hazardous waste in an unwashed container that previously held an incompatible waste, is it done in accordance with 3745-65-17(B)? [3745-66-77(B)]	Yes	☐	No	☐	N/A	√
52. If the generator has closed a <90 day accumulation area does the closure appear to have met the closure performance standard of 3745- 66-11? [3745-52-34(A)(1)]	Yes	☐	No	☐	N/A	√

PRE-TRANSPORT REQUIREMENTS

53. Does the generator package/label its hazardous waste in accordance with the applicable DOT regulations? [3745-52-30, 3745-52-31 and 3745-52-32(A)]	Yes	√	No	☐	N/A	☐
54. Does each container <110 gallons have a completed hazardous waste label? [3745-52-32(B)]	Yes	√	No	☐	N/A	
55. Before off-site transportation, does the generator placard or offer the appropriate DOT placards to the initial transporter? [3745-52-33]	Yes	√	No	☐	N/A	☐

U.S. EPA Inspection Checklist for Subpart CC – Container Management

Sonoco Flexible Packaging
708 South Avenue
Franklin, Ohio 45005
OHD 058 394 313

CC-1	265. 1080	Do any of the following exclusions apply? Satellite Containers Only	YES√	NO

Subpart CC requirements apply to all of the 55-gallon containers of ink and related clean-up materials that Sonoco accumulates in its 90-day accumulation area.

Only Sonoco's satellite accumulation containers are excluded from the requirements of Subpart CC

CC-2	265.1083	Do any of the following exemptions apply?	YES	NO √

Sonoco does not meet either of the exemptions from Subpart CC requirements because:
1. The waste ink and solvent being added to the 55-gallon containers has a VO concentration at the point of origination is greater than 500 ppm by weight

2. The waste ink and spent solvent have not been treated to meet LDR requirements

CC-3	265.1084	**Waste Determination**	Determination Not Needed √	**Determination Needed**

Sonoco used knowledge to determine that the VO concentration of their wastes was greater than 500 ppm

CC-4	265.1087	**CONTAINER MANAGEMENT**	NA	NI	OK √	DF

√ Level 1	Level 2	Level 3
Larger than 26.4 gallons and less than or equal to 122 gallons	Larger than 122 gallons	Larger than 26.4 gallons and treats by a stabilization process
Sonoco uses containers that meet DOT requirements 40 CFR 265.1087(c)(i)	Sonoco does not use Level 2 containers	Sonoco does not perform any form of treatment or stabilization of its waste in containers

CC -5	265.1087	**Operating Requirements**	NA	NI	OK √	DF

√ Level 1	Level 3
Sonoco complies with Level 1 operating requirements by keeping the covers and closure devices closed except when they are transferring spent ink or spent solvent into the 55-gallon containers.	Sonoco does not perform any form of treatment or stabilization of its waste in containers

CC-6	265.1089	**Inspection requirements**	NA	NI	√OK	DF
√ Level 1			Level 3			
Sonoco complies by inspecting the 55-gallon containers of spent ink and spent solvent in its 90-day accumulation area each week			Sonoco does not perform any form of treatment or stabilization of its waste in containers			
CC- 7	**265.1087**	**Repair requirements**	**NA**	**NI**	**OK √**	**DF**
√ Level 1			Level 3			
Sonoco has not detected a 55-gallon container that required repair			Sonoco does not perform any form of treatment or stabilization of its waste in containers			
CC- 8	**265.1090**	**Recordkeeping requirements**	**NA**	**NI**	**OK √**	**DF**
√ Level 1			Level 3			
Sonoco is not subject to recordkeeping requirements because they do not perform treatment of their waste using a stabilization technique.			Sonoco does not perform any form of treatment or stabilization of its waste in containers			

OhioEPA

State of Ohio Environmental Protection Agency

Division of Hazardous Waste Management
Southwest District Office
401 East Fifth Street
Dayton, Ohio 45402-2911

(937) 285-6092 (Direct)
(937) 285-6357 (General)
(937) 285-9769 (Fax)
larry.dickerson@epa.state.oh.us

Larry Dickerson
Environmental Specialist

SONOCO

Tim Nuckols
Plant Manager
Flexible Packaging

708 South Ave, Franklin, OH 45005 USA
phone: 937/746-4511, x213 • fax: 937/743-9673
tim.nuckols@sonoco.com

SONOCO

Dennis Sveinson
Production/Maintenance Manager
Flexible Packaging

708 South Avenue, Franklin, OH 45005-3654 USA
phone: 937/746-4511 ext 238 • fax: 937/743-9673
dennis.sveinson@sonoco.com 238

Separate Building → INK ROOM – 2 parts to building
1-drum storage
1-mix room

1-SA for mixing & cleaning inks

INK Storage Area

1-SA Solvent based glue
draining
draining individual drums

RCRA empty

(1) Solvent Based Glue

(2) ABSORBENTS | INK | SOLVENT

(3) INK & fill Bottoms

(4) Water Based Solvent

K010 & K00? both have catalyst

Contingency Plan - OK
Manifest - OK
Training - OK

Enforcement List

SONOCO FLEXIBLE PACKAGING **FRANKLIN** **OHD058394313**

EPA Unaddressed SNC: **N**	EPA Addressed SNC: **N**	EPA SNC with Compliance Schedule Established: **N**
State Unaddressed SNC: **N**	State Addressed SNC: **N**	State SNC with Compliance Schedule Established: **N**

Show All Violations

6 Enforcement(s) were found.

Page: 1 | Go To

	Enforcements								Violations	
	Act Loc	Identifier	Type	Date	Agency	Resp Person	Enforcement Desc		Count	
1	OH	006	120	04/22/2005	S	THEF	WRITTEN INFORMAL		1	Show Violations
2	OH	005	120	10/20/2003	S	SROT	WRITTEN INFORMAL		11	Show Violations
3	OH	004	120	10/07/2003	S	SROT	WRITTEN INFORMAL		5	Show Violations
4	OH	003	120	05/06/1999	S	OHLD	WRITTEN INFORMAL		8	Show Violations
5	OH	002	120	05/30/1989	S		WRITTEN INFORMAL		2	Show Violations
6	OH	001	120	08/22/1988	S		WRITTEN INFORMAL		1	Show Violations

URL: /rcrainfo/cme/cme_enf_list.jsp

Tim ~~Nuckles~~ Nuckols ?

Denny (2)

~~Swanson~~ Swinson

Lubrication Room

1 - Universal waste oil

1 - used oil 55 gal drum

on way out back

Sonoco 1999

Bought Graphic Packaging

adhesive laminator

laminating room

2 combi

adhesive laminator + extrusion plant

Black + Clawson laminator

K010

Black Clawson laminator

BC Room

1 - SA

catalyst adhesive

1 - Station laminator

cleaning + waste adhesive

1 - SA labeled 01/15/07

all consumer product - food FDA

1 press

3 laminators

Product 4 Roll stock

goes out in

Pre Make Ready for the press

PMR

1-SA for aerosol cans

Solvent still

Room 2

SA off go for rework

1-SA for absorbent & clean up

1-SA for canister filter

1-SA still bottom clean up

1-SA water base clean ups

Pump Room

1 - SA

Solvent

2 1,140 gal

1 - SA

cleaning

Comprehensive Permitting Report

Report run on: November 14, 2008 8:51 AM

SONOCO FLEXIBLE PACKAGING County Name / Code: WARREN / OH165 **OHD058394313**

Location: 708 SOUTH AVE, FRANKLIN, OH 45005 **REGION 05**

Mailing: 708 SOUTH AVE, FRANKLIN, OH 45005

Activity Location: OH	State District: SW	Non-Notifier:	Extract: Y	Active: Y	
Generator: LQG	Transporter: N	Operating TSDF: -----	IC In Place: N	EI Indicator (HE / GW): /	
Perm Prgrs: ---S-	Pclos Wrkld: -----	Subj CA: Y	Subj CA Non-TSD: N	CA GPRA 08: N	
Perm Wrkld: -----	Permits GPRA 06: N	Subj CA TSD 3004: N	CA Wrkld: N		
Clos Wrkld: ---S-	Renewals GPRA 06: N	Subj CA TSD Discr: Y			

Series Name	Seq.
APP01	1

Unit Name	Seq.	Process Code / Legal and Operating Status / Notes	# Units	Capacity	UOM	Effective Date
CONTAINER	1-1	CONTAINER Interim Status - Operating, Actively Managing Rcra-regulated Waste	1	15,600.00	Gal	10/20/1980

Event	Owner	Event Seq.	Resp. Agcy	Act.Loc.	Actual Date	Sched. Orig.	Sched. New
OP001	HQ	1	EPA	OH	10/20/1980		
Description: PART A RECEIVED							

Unit Name	Seq.	Process Code / Legal and Operating Status / Notes	# Units	Capacity	UOM	Effective Date
CONTAINER	1-2	CONTAINER Interim Status - Inactive/closing, But Not Yet Rcra Closed	1	15,600.00	Gal	01/10/1985

Event	Owner	Event Seq.	Resp. Agcy	Act.Loc.	Actual Date	Sched. Orig.	Sched. New
CL360ME	HQ	1	EPA	OH	03/11/1985		
Description: PLAN APPROVED - CLOSURE-FINAL CLOSURE							
CL340	US	1	EPA	OH	02/06/1985		
Description: PUBLIC NOTICE - CLOSURE							
CL310	HQ	1	EPA	OH	01/10/1985		
Description: PLAN RECEIVED - CLOSURE							
CL370	US	1	EPA	OH	01/10/1985		
Description: RECEIVE CLOSURE CERTIFICATION							

Unit Name	Seq.	Process Code / Legal and Operating Status / Notes	# Units	Capacity	UOM	Effective Date
CONTAINER	1-3	CONTAINER Interim Status - Converted But Not Rcra Closed	1	15,600.00	Gal	03/11/1985

Event	Owner	Event Seq.	Resp. Agcy	Act.Loc.	Actual Date	Sched. Orig.	Sched. New
OP003AD	HQ	1	EPA	OH	03/11/1985		
Description: PROCESS DETERMINATION-AGENCY (STATE OR EPA) DETERMINATION							

Unlinked Units and Seq. No.

Unlinked Events	Owner	Event Seq.	Resp. Agcy	Act.Loc.	Actual Date	Sched. Orig.	Sched. New

* End of Report *

Color Pack

Dennis.Sveinson@sonoco.com

02/06/2009 03:02 PM

To

Subject Re:

We have two adhesive laminators one is called a combi. The third room was the Press room. The two laminators are K008 and K010. The press is K009. We only use ethyl acetate with our adhesives. We do not use xylene in our shop.We can not recycle our adhesives. I reuse the solvent that is reclaimed from the dirty or waste ink for wash up. I hope I have answered your questions. If there is anything else please call me. 1-937-746-4511 ext 238
Thanks
Dennis Sveinson

Campbell.Duncan

02/06/2009 03:11 PM

To dennis.sveinson@sonoco.com

cc

Subject

Dennis -

I've had a few senior moments with respect to what I saw.

What equipment is in PTE Room?

Are the three laminators designated K008, K009 and K010?.

I wrote down that you had two laminating rooms and a combi?

Do you use a xylene blend to clean the adhesive from the laminators -- and the presence of a catalyst prevents it from being reclaimed in the solvent still?

Do you re-use the ink that you run through the solvent still?

Thanks
DC

EPA United States Environmental Protection Agency

Handler Details

RCRAInfo

SONOCO FLEXIBLE PACKAGING **FRANKLIN** **OHD058394313**

Universes for Ohio	View Universes for OH

Handler Universes

Active Status	Controls in Place	In a Universe	Gen. Status	Transporter	Univ. Waste	Recycler	Used Oil	Furnace Exempt	Import
H--C-	N	Y	LQG	N	N	N	NNNNNNN	N	N

Permitting and Corrective Action Universes

Permit Workload	Closure Workload	Post-Closure Workload	Permit Progress	CA Workload	Subject to CA	Subject to CA - TSD	Subject to CA - Discretion	Subject to CA - Non-TSD
-----	---S-	-----	---S-	N	Y	N	Y	N

Compliance, Monitoring and Enforcement and GPRA Universes

Full Enforcement	Operating TSDF	SNC	BOYSNC	Permit GPRA	Renewals GPRA	CA GPRA
-----	-----	N	N	N	N	N

Source Summary Table

** indicates this source record was used for the Universe Calculations.

Act. Loc.	Source	Sequence	Receipt date	Non-notifier
OH	** B	6	02/23/2007	
OH	B	5	02/23/2006	
OH	B	1	02/25/2004	
OH	B	4	02/25/2004	
OH	R	7	05/19/2003	
OH	B	2	02/27/2003	
OH	N	1	08/23/2000	
OH	R	6	02/17/2000	
OH	R	5	02/20/1998	
OH	R	4	03/01/1996	

OH	R	3	02/22/1994	
OH	R	2	03/01/1992	
OH	R	1	02/27/1990	
OH	A	1	10/20/1980	
OH	I	1	01/01/1979	

Site Detail Report

Universe Justification Report

Maintain Other IDs

Back to the Transaction Menu Go To

URL: /rcrainfo/handler/handler_main.jsp

EPA United States Environmental Protection Agency

Evaluation List

RCRA Info

SONOCO FLEXIBLE PACKAGING **FRANKLIN** **OHD058394313**

EPA Unaddressed SNC: **N**	EPA Addressed SNC: **N**	EPA SNC with Compliance Schedule Established: **N**
State Unaddressed SNC: **N**	State Addressed SNC: **N**	State SNC with Compliance Schedule Established: **N**

Show All Violations

12 Evaluation(s) found.

Page: 1 | Go To

	Evaluations							Violations	
	Act Loc	Identifier	Type	Date	Agency	Resp Person	Evaluation Desc	Count	
1	OH	012	NRR	04/22/2005	S	THEF	NON-FINANCIAL RECORD REVIEW	1	Show Violations
2	OH	011	NRR	11/20/2003	S	SROT	NON-FINANCIAL RECORD REVIEW	No violations found.	
3	OH	010	CEI	09/23/2003	S	SROT	COMPLIANCE EVALUATION INSPECTION ON-SITE	13	Show Violations
4	OH	009	FUI	09/21/1999	S	OHTS	FOLLOW-UP INSPECTION	No violations found.	
5	OH	008	CEI	04/12/1999	S	OHLD	COMPLIANCE EVALUATION INSPECTION ON-SITE	8	Show Violations
6	OH	007	CEI	03/13/1996	S	OHMJ	COMPLIANCE EVALUATION INSPECTION ON-SITE	No violations found.	
7	OH	005	CEI	05/10/1989	S		COMPLIANCE EVALUATION INSPECTION ON-SITE	2	Show Violations
8	OH	006	FCI	05/10/1989	S		FOCUSED COMPLIANCE INSPECTION	No violations found.	
9	OH	003	CEI	08/16/1988	S		COMPLIANCE EVALUATION INSPECTION ON-SITE	1	Show Violations
10	OH	004	FCI	08/16/1988	S		FOCUSED COMPLIANCE INSPECTION	1	Show Violations
11	OH	002	CEI	09/23/1986	S		COMPLIANCE EVALUATION INSPECTION ON-SITE	No violations found.	
12	OH	001	CEI	07/23/1985	S		COMPLIANCE EVALUATION INSPECTION ON-SITE	No violations found.	

URL: /rcrainfo/cme/cme_eval_list.jsp

Insp 01/15/09
9:00 am

Site Identification Form

r : OHD058394313 Facility: Sonoco Flexible Packaging Receipt Date: 02/28/2008

Location : 708 South Avenue

Franklin OH 45005

NAICS Code (s) : 323111

Site County Name: Warren

Site Land Type: Private

Reason For Submittal:

Subsequent Notif: Y

Annual Report: Y

Total Tons:

Generated : 153.36

Shipped : 153.36

Contact Info

Contact Name: Dennis Sveinson

Contact Address Line1: 708 South Avenue

Contact Address Line2:

Contact City/State: Franklin OH

Contact Country:

Contact Zip: 45005

Contact Title: Production Mana

Contact Phone: 937-746-4511 238

Contact Fax: 937-743-9673

Contact Email: dennis.sveinson@sonoco.com

Hazardous Waste Activities :

Annual Report Generator Status: LQG

Generator Status at time of certification : LQG

Importer:	N	Recycler:	N
Mixed Waste Generator:	N	Small Burner Exemption:	N
Transporter:	N	Furnace Exemption:	N
TSD:	N	UIC:	N

Used Oil Activities :

Transporter:	N
Transfer Fac:	N
Processor:	N
Refiner:	N
Burner:	N
Marketer Direct:	N
Marketer First:	N

Universal Waste Activities :

	Managed:
Batteries:	N
Pesticides:	N
Mercury Containing Equipment:	N
Lamps:	N
Large Qty Handler:	N

Site ID Comments:

Form GM - Generation and Management

Waste: Waste ink and solvents **PrevYrGen:** 4785 Page 1
S' **Origin:** **SysType:** **Source:** G07 **POM:** **Form:** W209 **Rad:** - **CurrYrGen:** 9225 **G** 8 Lbs. / Gal.
L 003 **Shipped:** Y

Receiving Facility	SysType	Avail	Quantity
OHD005048947	H061		9225

from inks → Recycled from still

Waste: Waste still sludge **PrevYrGen:** 3900 Page 2
SIC: **Origin:** **SysType:** **Source:** G24 **POM:** **Form:** W604 **Rad:** - **CurrYrGen:** 8195 **G** 8 Lbs. / Gal.
D001 F003 **Shipped:** Y

Receiving Facility	SysType	Avail	Quantity
OHD093945293	H061		8195

Catalyzed adhesives

Waste: Waste solvent-based adhesives **PrevYrGen:** 10010 Page 3
SIC: **Origin:** **SysType:** **Source:** G09 **POM:** **Form:** W209 **Rad:** - **CurrYrGen:** 15290 **G** 8 Lbs. / Gal.
D001 F003 **Shipped:** Y

Receiving Facility	SysType	Avail	Quantity
OHD093945293	H061		15290

Returned to inks

Waste: Waste solids containing flammable liquid **PrevYrGen:** 3384 Page 4
SIC: **Origin:** **SysType:** **Source:** G09 **POM:** **Form:** W409 **Rad:** - **CurrYrGen:** 5940 **G** 7 Lbs. / Gal.
D001 F003 **Shipped:** Y

Receiving Facility	SysType	Avail	Quantity
OHD093945293	H061		5940

Waste: Waste solvents from tank flushing **PrevYrGen:** 0 Page 5
SIC: **Origin:** **SysType:** **Source:** G13 **POM:** **Form:** W219 **Rad:** - **CurrYrGen:** 495 **G** 7 Lbs. / Gal.
D001 **Shipped:** Y

Receiving Facility	SysType	Avail	Quantity
OHD048415665	H040		495

Form OI - Off-site Transporter and Receiving Facility Information

EPA ID: OHD042311209 **Name:** Ashland
X **- Transporter** **Address:** 5200 Blazer Parkway
- Receiving Facility Dublin, OH

EPA ID: MID981956063 **Name:** Valley City Environmental
X **- Transporter** **Address:** 1040 Market Ave SW
- Receiving Facility Grand Rapids, MI 49503

EPA ID: OKD981588791 **Name:** Triad Transport
X **- Transporter** **Address:** PO Box 818
- Receiving Facility McAllister, OK 74501

EPA ID: OHD005048947 **Name:** Systech-Paulding
- Transporter **Address:** 11997 Country Road 176
Receiving Facility Paulding, OH 45879

E. . OHD048415665 **Name:** Ross Incineration Services
- Transporter **Address:** 36790 Giles Road
X **- Receiving Facility** Grafton, OH

Form OI - Off-site Transporter and Receiving Facility Information

EPA ID: OHD093945293 **Name:** Veolia ES Technical Solutions

Transporter **Address:** 4301 Infirmary Road

eceiving Facility West Carrollton, OH 45449

NAICS Association

323112 Commercial Flexographic Printing

This U.S. industry comprises establishments primarily engaged in flexographic printing without publishing (except books, grey goods, and manifold business forms). This industry includes establishments engaged in flexographic printing on purchased stock materials, such as stationery, invitations, labels, and similar items, on a job order basis.

Cross-References. Establishments primarily engaged in--

- **Printing on grey goods--are classified in Industry 31331, Textile and Fabric Finishing Mills;**
- **Printing books and pamphlets--are classified in U.S. Industry 323117, Books Printing;**
- **Printing manifold business forms including checkbooks--are classified in U.S. Industry 323116, Manifold Business Forms Printing;**
- **Manufacturing printed stationery, invitations, labels, and similar items--are classified elsewhere in Subsector 322, Manufacturing; and**
- **Printing and publishing, known as publishers,--are classified in Subsector 511, Publishing Industries (except Internet).**

No change 1997 to 2002 | 2002 NAICS to 1987 SIC | 1997Economic Census | Bridge Between 1997 NAICS and SIC

2002 NAICS	1997 NAICS	1987 SIC	Corresponding Index Entries
323112	323112	2759	Address lists flexographic printing without publishing
323112	323112	2759	Agricultural magazines and periodicals flexographic printing without publishing
323112	323112	2759	Art prints flexographic printing without publishing
323112	323112	2759	Atlases flexographic printing without publishing
323112	323112	2759	Business directories flexographic printing without publishing
323112	323112	2759	Business forms (except manifold) flexographic printing without publishing
323112	323112	2759	Calendars flexographic printing without publishing
323112	323112		Cards (e.g., business, greeting, playing, postcards, trading) flexographic printi
323112	323112	2759	Catalogs flexographic printing without publishing
323112	323112	2759	Catalogs of collections flexographic printing without publishing
323112	323112	2759	Comic books flexographic printing without publishing
323112	323112	2759	Commercial flexographic printing

323112	323112	2759	Databases flexographic printing without publishing
323112	323112	2759	Directories flexographic printing without publishing
323112	323112	2759	Discount coupon books flexographic printing without publishing
323112	323112	2759	Financial magazines and periodicals flexographic printing without publishing
323112	323112	2759	Flexographic printing (except books, manifold business forms, printing grey goods
323112	323112	2759	Globe covers and maps flexographic printing without publishing
323112	323112	2771	Greeting cards (e.g., birthday, holiday, sympathy) flexographic printing without
323112	323112	2759	Guides, street map, flexographic printing without publishing
323112	323112	2759	Job printing, flexographic
323112	323112	2759	Juvenile magazines and periodicals flexographic printing without publishing
323112	323112	2759	Magazines and periodicals flexographic printing without publishing
323112	323112	2759	Maps flexographic printing without publishing
323112	323112	2759	Music, sheet, flexographic printing without publishing
323112	323112	2759	Newsletters flexographic printing without publishing
323112	323112	2759	Newspapers flexographic printing without publishing
323112	323112	2759	Patterns and plans (e.g., clothing patterns) flexographic printing without publis
323112	323112	2759	Periodicals flexographic printing without publishing
323112	323112	2759	Postcards flexographic printing without publishing
323112	323112	2759	Posters flexographic printing without publishing
323112	323112	2759	Print shops, flexographic
323112	323112	2759	Printing, flexographic (except books, grey goods, manifold business forms)
323112	323112	2759	Professional magazines and periodicals flexographic printing without publishing
323112	323112	2759	Racetrack programs flexographic printing without publishing
323112	323112	2759	Racing forms flexographic printing without publishing
323112	323112	2759	Radio guides flexographic printing without publishing
323112	323112	2759	Radio schedules flexographic printing without publishing
323112	323112	2759	Religious magazines and periodicals flexographic printing without publishing
323112	323112	2759	Scholarly journals flexographic printing without publishing
323112	323112	2759	Scholastic magazines and periodicals flexographic printing without publishing
323112	323112	2759	Sheet music flexographic printing without publishing
323112	323112	2759	Shipping registers flexographic printing without publishing
323112	323112	2759	Stationery, flexographic printing, on a job-order basis
323112	323112	2759	Technical magazines and periodicals flexographic printing without publishing
323112	323112	2759	Telephone directories flexographic printing without publishing
323112	323112	2759	Television guides flexographic printing without publishing
323112	323112	2759	Trade journals flexographic printing without publishing
323112	323112	2759	Trade magazines and periodicals flexographic printing without publishing

Extrusion coating

From Wikipedia, the free encyclopedia

Extrusion coating is the coating of a molten web of resin on to a substrate material. It is a versatile coating technique used for economic application of various plastics, notably polyethylene, onto board, paper, aluminium foils, cellulose or plastic films.

The actual process of extrusion coating involves extruding resin from a slot die at temperatures up to 320°C directly onto the moving web which is then passed through a nip consisting of a rubber covered pressure roller and a chrome plated cooling roll. The latter cools the molten film back into the solid state and also imparts the desired finish to the plastic surface. Variations of extrusion coating are "extrusion laminating" (which is the entirely same process, only that the extruded hot molten resin acts as the bonding medium to a second web of material), and co-extrusion (again the same process only with two or more extruders coupled to a single die head in which the individually extruded melts are brought together and finally extruded as a multi-layer film).

The market for extrusion coating includes a variety of end-use applications such as: Liquid Packaging, Photographic, Flexible Packaging, and Commercial Applications (including among others: Mill and Industrial Wrappings, Transport Packaging, Sack Linings, Building, Envelopes, Medical/Hygiene and Release Base).

Black Clawson Converting Machinery | EGAN | ER-WE-PA

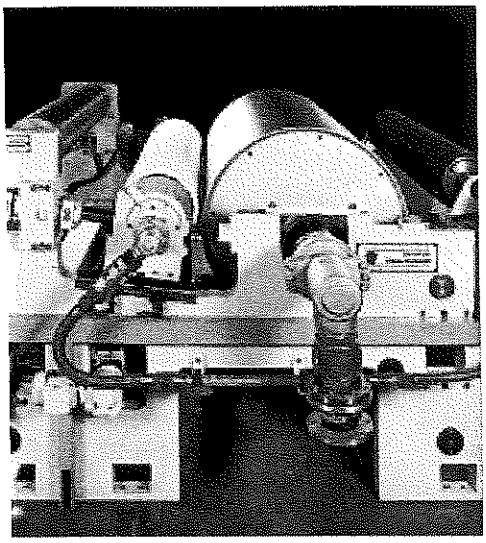
Products - Extrusion Coating & Laminating - Overview

Extrusion Coating & Laminating

Our world-class extrusion coating and laminating technology is based on the strengths of our heritage brands – Black Clawson Converting Machinery, Egan, and ER-WE-PA – to offer multiple solutions second to none. We offer standardized platforms to address various customer requirements in cost-effective packages at all levels of sophistication. Our product range includes everything from laboratory-size lines for product testing to 5-meter-wide lines serving industrial materials markets.

We understand that extrusion coating and laminating converters want the best possible process and control solutions to ensure product quality while limiting production costs; we support that mindset. Our sub-components seamlessly integrate into a process line to allow for custom configurations, including various levels of unwinding and winding equipment, to address both the product being run and budget. Our R&D team continually collects theoretical and practical run data to develop highly efficient extrusion systems to achieve desired results. Our Integrator and Exact control systems provide flexible, intuitive operator interfaces to simplify line operation. Upgrades to existing lines built by us or others can extend the life of your equipment at a reasonable cost and payback.

Designed to produce high-quality packaging materials, this flexible packaging line is efficient and cost-effective.



At the high speeds of today's state-of-the-art extrusion coating lines, fully automatic laminators like this are an essential feature to obtain outstanding productivity.

Features and Benefits

- **Melt Quality**
  Our extruders are equipped with Davis-Standard screws to deliver the most uniform melt temperatures on the market. Stable output throughout the entire range allows process optimization at lower speeds with predictable performance and only minor adjustment at higher speeds.
- **Custom Configurations**
  Our experienced design staff utilizes different configurations to install the right number of extruders with the right screws and output capacities to process your full range of products. Vertical gearboxes, low profile bases, cantilevered mountings, and separate die supports are all proven options.
- **Profile Uniformity**
  Davis-Standard was one of the first OEM's to embrace computer controlled APC control. Today, our Series 50 dies with internal deckling and automatic thermocouple feedback adjusting bolts are running at widths up to 3.5 meters. We use gauging systems from industry leaders that employ beta and infrared technology in a complex system to get the most accurate measurements of individual layers in your structure.
- **Machine Automation**
  Set-up "on the fly" is a concept we understand. Our Integrator control system can position various components

along the line according to individual product recipes. Electronic actuators are used to position guide sensors, die deckling, chill roller release tape, edge trimmers, and label applicators with minimal operator interface. We also interface with roll handling and resin systems to maintain a consistent raw material stream into the machine and promptly address any alarms or malfunctions.

- **Flexibility**
  Our screw designs and extruder size selections address current needs while anticipating future needs to accommodate products not yet developed.
- **Operator Friendly Controls**
  The intuitive layout of the Integrator control system in the U.S. and Exact system in Europe instill operator confidence from the first use. Background systems for troubleshooting, drawing catalogs, and set-up information combined with Internet updates keep the system software current and performance optimized.
- **Modular Systems**
  "Plug and play" accurately describes our extrusion coating and laminating equipment. Individual machine sections are designed to be independent links in the chain. PLC's, drive controllers, motor starters, etc. all reside within the machine section. Upon arrival at the customer's plant, after the mechanical installation, minimal time is required to install the power, communication, and pneumatic connections to achieve machine operation.
- **Custom Solutions**
  When our standard components might not completely satisfy the customer's needs, we have an experienced and creative engineering staff to help custom design unique solutions for your particular needs. High speed and high output designs are common.

Black Clawson | EGAN | ER-WE-PA
Converting Machinery

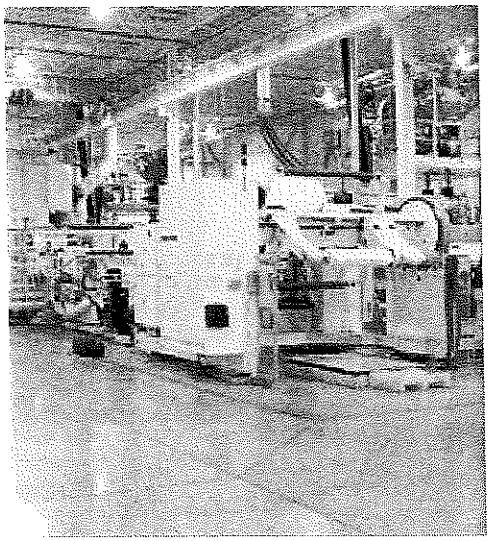
Products - Extrusion Coating & Laminating - Flexible Packaging & Laminating

TYPICAL SPECIFICATIONS

APPLICATIONS:	LIDDING STOCK, CANDY WRAPPERS, SNACK FOOD BAGS, MEDICAL PACKAGING, CONDIMENT PACKS, SOUP SACHETS, TOOTHPASTE TUBES, CABLE WRAP, LAMINATION FILMS
WIDTH:	500 - 2000 MM (20 - 80 INCHES)
LINE SPEEDS:	100 - 750 MPM (300 - 2500 FPM)
TENSION RANGE:	35 - 350 N/M (0.2 - 2.0 PLI)
THICKNESS RANGE:	12 - 100 GSM (.5 - 4 MILS)
FINISHED ROLL DIAMETERS:	UP TO 1250 MM (50 INCHES)
EXTRUDER OUTPUTS:	UP TO 1000 KG (2200 LBS) SINGLE EXTRUDER UP TO 1850 KG (4000 LBS) IN CO-EXTRUSION ARRANGEMENT (THREE EXTRUDERS)
FEATURES:	WIDE RANGE OF LINE EQUIPMENT SOLUTIONS TO SUIT CUSTOMER'S REQUIREMENTS AND BUDGETS, LATEST CONTROLS SYSTEMS, FULL LINES AND SYSTEMATIC UPGRADE/RETROFITS

Flexible Packaging & Laminating

Davis Standard's Converting Systems Group combines the design highlights of Black Clawson, Egan and ER-WE-PA to offer the converter the best and most innovative technology available. We understand that each customer has different requirements to produce a specific product. It is our job to engineer a system that will satisfy those needs.



Designed to produce high-quality packaging materials, this flexible packaging line is efficient and cost-effective.

Our unwinds and winders are available in shafted or shafless designs to integrate with the converter's existing material handling processes. Alternatively we can provide the material handling system as part of the line. We offer single direction and double direction turrets with fully automatic splicing and transfer systems.

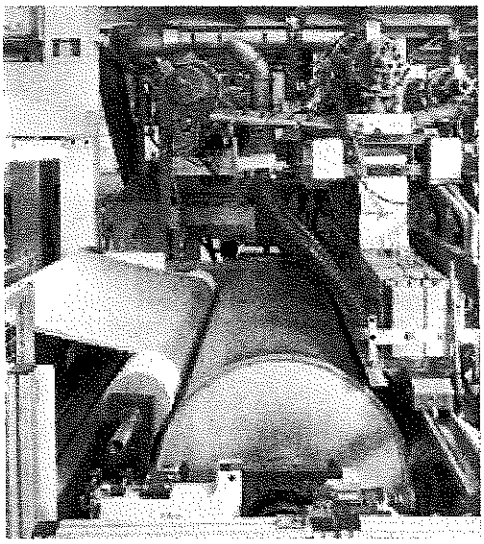
Our liquid coating sub-group supplies the latest in priming and drying so that the highest levels of adhesion can be achieved. In addition, liquid coating and laminating equipment for adhesive or dry-bond lamination could be added to the extrusion coating and laminating line to further expand its capabilities. We have relationships with the major vendors of corona discharge equipment worldwide, giving us the ability to seamlessly integrate their treaters into our flexible packaging extrusion coating and laminating lines.

Davis Standard's screw designs are designed to deliver the best melt quality to the feedblock for complex coextrusion applications. We control wrinkles in our laminators by installing bowed, spiraled or herringbone

rollers, depending on the material to be run. Accurate, repeatable nip performance is achieved with either a linear acting or pivoting motion rubber roller. These rollers come into contact with the laminating drum by using recipe stored pressures and PLC controlled valves. Lightweight hard-surfaced aluminum or carbon fiber idler rollers are used to convey the webs between machine sections without disturbing process tension levels.

For overall line control, we offer the Integrator and Exact control systems. The choice of system is based on customer requirements.

Tell us what you need and let our experienced staff help you process marketable, cost-effective products.



A high performance coextrusion station for aseptic and flexible packaging.

Flexography

From Wikipedia, the free encyclopedia

A flexographic printing plate.

Flexography (often abbreviated to **flexo**) is a form of printing process which utilizes a flexible relief plate. It is basically an updated version of letterpress that can be used for printing on almost any type of substrate including plastic, metallic films, cellophane, and paper. That's why it's widely used for printing on the non-porous substrates required for various types of food packaging (it is also well suited for printing large areas of solid color).

Contents

Part of the series on the
History of printing

Woodblock printing	200
Movable type	1040
Intaglio	1430s
Printing press	1454
Lithography	1796
Chromolithography	1837
Rotary press	1843
Flexography	1873
Mimeograph	1876
Hot metal typesetting	1886
Offset press	1903
Screen-printing	1907
Dye-sublimation	1957
Phototypesetting	1960s
Photocopier	1960s
Pad printing	1960s
Laser printer	1969
Dot matrix printer	1970
Thermal printer	
Inkjet printer	1976
3D printing	1986
Stereolithography	1986
Digital press	1993

History

The process of flexography was then dubbed "aniline printing," named for the aniline oil used in the ink, that would be jetted out by the use of Anliox roll. In 1890, the first patented press was built in England by Bibby, Baron and Sons. The water-based ink smeared easily, leading the device to be known as "Bibby's Folly". In the early 1900's, other European presses were developed using rubber printing plates. But by the 1920s, most presses were made in Germany, where the process was called "gummidruck".

During the early part of the 20th century, the technique was used extensively in food packaging in the United States. However, in the 1940's, the Food and Drug Administration classified aniline dyes as unsuitable for food packaging. Printing sales plummeted. Individual firms tried using new names for the process, such as "Lustro Printing" and "Transglo Printing," but met with limited success. Even after the government approved the aniline process, sales continued to decline. Intent on re-popularizing aniline printing by changing its name, Franklin Moss, president of Mosstype Corporation, surveyed the industry in 1951 and received over 200 different name suggestions. In October 1952, the new name was announced;

"flexography."[1]

Evolution

Originally flexographic printing was basic in quality. Labels requiring high quality have generally been printed using the offset process until recently. In the last few years great advances have been made to the quality of flexographic printing presses.

The greatest advances in flexographic printing have been in the area of photopolymer printing plates, including improvements to the plate material and the method of plate creation.

Digital direct to plate systems have dominated the industry recently with their better resolution and the ability to print four color process (or more) as well as offset. Companies like Dupont, MacDermid, Kodak and Esko have pioneered the latest technologies with advances in FAST washout and the latest screening technology, even companies who make plates in house are going to trade shops to get these high quality plates.

Laser-etched anilox rolls also play a part in the improvement of print quality. Full color picture printing is now possible, and some of the finer presses available today, in combination with a skilled operator, allow quality that rivals the lithographic process. One ongoing improvement has been the increasing ability to reproduce highlight tonal values, thereby providing a workaround for the very high dot gain associated with flexographic printing.

Process Overview

1. Platemaking[2]
The first method of plate development uses light-sensitive polymer. A film negative is placed over the plate, which is exposed to ultra-violet light. The polymer hardens where light passes through the film. The remaining polymer has the consistency of chewed gum. It is washed away in a tank of either water or solvent. Brushes scrub the plate to facilitate the "washout" process. The process can differ depending on whether solid sheets of photopolymer or liquid photopolymer are used, but the principle is still the same. The second method used a computer-guided laser to etche the image onto the printing plate. Such a direct laser engraving process is called digital platemaking. The third method is to go through a molding process. The first step is to create a metal plate out of the negative of our initial image through an exposition process (followed by an acid bath). This metal plate in relief is then used in the second step to create the mold that could be in bakelite board or even glass or plastic, through a first molding process. Once cooled, this master mold will press the rubber or plastic compound (under both controlled temperature and pressure) through a second molding process to come up with the printing plate.

2. Printing
A flexographic print is made by creating a positive mirrored master of the required image as a 3D relief in a rubber or polymer material. Flexographic plates can be created with analog and digital platemaking processes. The image areas are raised above the non image areas on the rubber or polymer plate. The ink is transferred from the ink roll which is partially immerged in the ink tank. Then it transfers to the anilox roll (or meter roll) whose texture holds a specific amount of ink since it's covered with thousands of small wells or cups that enable it to meter ink to the printing plate in a uniform thickness evenly and quickly (the number of cells per linear inch can vary according to the type of print job and the quality required)[3]. To avoid getting a final product with a smudgy or lumpy look it must be ensured that the

amount of ink on the printing plate is not excessive. This is achived by using a scraper, called a doctor blade. The doctor blade removes excess ink from anilox roller before inking the printing plate. The substrate is finally sandwiched between the plate and the impression cylinder to transfer the image.[4]

Flexographic printing inks

The nature and demands of the printing process and the application of the printed product determine the fundamental properties required of flexographic inks. Measuring the physical properties of inks and understanding how these are affected by the choice of ingredients is a large part of ink technology. Formulation of inks requires a detailed knowledge of the physical and chemical properties of the raw materials composing the inks, and how these ingredients affect or react with each other as well as with the environment. Flexographic printing inks are primarily formulated to remain compatible with the wide variety of substrates used in the process. Each formulation component individually fulfils a special function and the proportion and composition will vary according to the substrate.

Applications

Flexo has an advantage over lithography in that it can use a wider range of inks, water based rather than oil based inks, and is good at printing on a variety of different materials like plastic, foil, acetate film, brown paper, and other materials used in packaging. Typical products printed using flexography include brown corrugated boxes, flexible packaging including retail and shopping bags, food and hygiene bags and sacks, milk and beverage cartons, flexible plastics, self adhesive labels, disposable cups and containers, envelopes and wallpaper. A number of newspapers now eschew the more common offset lithography process in favour of flexo. Flexographic inks, like those used in gravure and unlike those used in lithography, generally have a low viscosity. This enables faster drying and, as a result, faster production, which results in lower costs.

Printing press speeds of up to 600 meters per minute (2000 feet per minute) are achieveable now with modern technology high-end printers, like Flexotecnica [1] (http://www.cerutti.it/group/flexotecnica/company.html), which introduced the world's first 12-color central impression (CI) drum press at Drupa 2008. This groundbreaking technology won the prestigious FlexoTech (UK) Innovation Award in 2008 [2] (http://www.convertingmagazine.com/article/CA6618054.html).

Other press formats, such as in-line and stack presses, are available from Tresu and other suppliers.

Education

The Flexo in Education Program, formerly The Flexo in High School Program, was started at South Mecklenburg High School in Charlotte, North Carolina by the Flexographic Technical Association in 1993. Since its inception many other high school programs have been started. For example Asheville High School in Asheville, NC, The Applied Technology Center in Rock Hill, SC, Fort Mill High School in Fort Mill, SC, and others. The program has even gone international with the inclusion of Gordon Graydon Memorial Secondary School in Mississauga, Ontario, Canada. The program was re-named to become The Flexo in Education Program because post-secondary institutions began to participate in the program. Many technical colleges and universities incorporate flexography into their curriculum. For

example Fox Valley Technical College Flexographic Research and Training Center in Appleton WI (http://www.fvtc.edu/graphicarts)The Department of Graphic Communications (http://graphics.clemson.edu/) and the Clemson University Printing and Converting Research Center (http://www.clemson.edu/centers-institutes/printcon) at Clemson University (http://www.clemson.edu/), Central Piedmont Community College (http://www.cpcc.edu/), Chowan University (http://www.chowan.edu/), Appalachian State University (http://www.appstate.edu/), the Graphic Communications Management program at Ryerson University, and others include flexography in their curriculum.

Sadly, Charlotte-Mecklenburg Schools, the school district where Flexo in Education got its start, announced in 2008 that the first ever Flexo in High School program at South Mecklenburg High School would be discontinued. The building where their flexography lab was located was demolished Monday, July 7, 2008, to make way for a new 3-story building to house the school's science and technology department. The school district determined that it would be too difficult and expensive to move, store, and re-install press and equipment in the old lab. It was, instead, donated to another school in North Carolina to start a new flexo program.

References

Footnotes

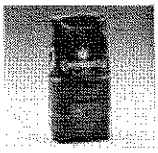
1. ^ The Pressman
2. ^ Printers' National Environmental Assistance Center: http://www.pneac.org/printprocesses/flexography/moreinfo8.cfm
3. ^ International Paper - Knowledge center - Flexography: http://glossary.ippaper.com/default.asp?req=knowledge/article/151
4. ^ Johansson, Lundberg & Ryberg (2003) "A guide to grapic print production", John Wiley & Sons Inc., Hoboken, New Jersey.

Notations

- http://www.thepressman.com/Pressman%20April%202003.pdf

Flexographic printing

Related Products and Services



Roll stock

Roll-fed labels

Rotogravure printing

Technology

Flexographic printing

Ideal for converting, roll-fed and sleeved labels using shrink and shrink film, stand-up pouches, pre-made bags and form/fill/seal, has wide and narrow presses that can accommodate short- and jobs with ease.

Sonoco is also capable of in-line adhesive and extrusion lamina as cold-seal coating. Let Sonoco show you how we can help yo and cost from your projects.

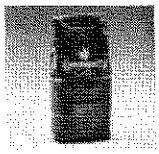
Highlights

- Flexographic printing up to nine colors
- Wide and narrow presses, up to 62" and 24", respectivel
- In-line adhesive lamination
- In-line extrusion lamination
- In-line cold seal coating
- Vertically integrated rubber/polymer plate making
- Roto/flexo combination printing

services >>> flexible film lamination

Flexible film lamination

Related Products and Services



Roll stock

Roll-fed labels

Flexographic printing

Rotogravure printing

Flexible film lamination

With more than 50 years of flexible packaging experience and k Sonoco is North America's leading provider of gravure barrier la to the retail food and non-food industries.

Lamination combines the best of all film properties, including:

- Visual appeal
- Moisture
- Aroma and oxygen barriers
- Machinability
- Cost-effectiveness

To develop the most effective lamination structure, Sonoco offer numerous equipment, lamination, coating and printing options. \ core, in-stock laminations and are also experts at customizing w need.

Choose the best combination for your package:

- More than 14 off-line laminating units
- Tandem extrusion lamination and coating (coex-capabili
- Tandem adhesive/extrusion and dry bond adhesive lami
- Solventless-, solvent- and water-based adhesive laminat
- Hot melt coating
- In-line rotogravure or flexographic printing and laminatio

Let Sonoco design and produce a superior laminated structure f

Rotogravure printing

Related Products and Services

Roll stock

Cylinder engraving

Film lamination

Flexographic printing

Technology

Rotogravure printing

Sonoco operates world-class rotogravure presses capable of pri 11 colors or 10 colors with in-line lamination.

Sonoco also maintains a strategic alliance with Keating Gravure the premier cylinder engravers in the world. Keating USA operat the most automated cylinder engraving operations in North Ame

Highlights

- Rotogravure printing up to 11 colors or 10 colors with in-line lamination
- Wide and narrow web, up to 55" and 26", respectively
- In-line lamination for secondary film adhesive lamination
- Registered cold and heat seal in one pass
- Multiple reversing stations for on-pack promotions
- Roto/flexo combination printing
- Special effects like holography and profiling
- Strategic alliance with leading cylinder engraver

Choose from our quick, easy and cost-effective print-based pror changes.

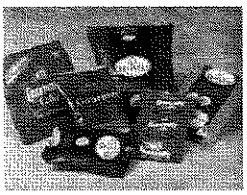
- On pack print promotions
- Sonowin™
- Sonostick™
- SonoFlair
- Thermochromic inks
- Photochromic inks
- Glow in the dark
- Coin reactive
- Inkjet gaming
- Tattoo-It

Flexible bags and pouches

For shelf appeal and product differentiation, Sonoco's high-perfo and flexographic flexible bags are ideal for confectionery, hard-b products. Easy to open, close and carry, flexible pouches are id to super-sized packages, consumers can zip, sip and take your

Bags: Consumer products companies love the portion packs and on-the-go products to numerous sizes, barrier options, single-serv

Stand-up pouch: If you're looking for packaging options, con Customers prefer the look and convenience of the package, an wide range of performance requirements. Custom shapes are a >>>



Fractional packs: Sonoco is brewing and other products. With the fractional packs to meet your needs. The ability t packages visually appealing to the mos

Brick pack: Ideal for ground vacuum-packed flavored or unfla flexible brick packs are designed to lock freshness in for a delic time. >>>

Sonotort™ retort pouch: Responding t beverages with industry leading retort techn manufacturing capacity, and ongoing produc

Minibrick pack: Ideal for the gourmet coffee enthusiast, Son designed to be visually appealing while keeping contents fresh

SENDER: *COMPLETE THIS SECTION*

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Tim Nuckols, Plant Manager
Sonoco Flexible Packaging
708 South Avenue
Franklin, Ohio 45005

COMPLETE THIS SECTION ON DELIVERY

A. Received by *(Please Print Clearly)* | B. Date of Delivery

C. Signature
X

☐ Agent
☐ Addressee

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

FRANKLIN OH 450
FEB 25 2009
USPS

3. Service Type
☑ Certified Mail ☐ Express Mail
☐ Registered ☑ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? *(Extra Fee)* ☐ Yes

2. Article Number
(Transfer from service label) 7001 0320 0006 1448 7326

PS Form 3811, March 2001 Domestic Return Receipt 102595-01-M-1424

AUG 11 1989

5HR-12

Mr. Ron Kline
Graphic Packaging of Ohio Corporation
708 South Avenue
P.O. Box 308
Franklin, Ohio 45005-0308

Re: Compliance Letter
Graphic Packaging of Ohio Corporation
OHD 058 394 313

Dear Mr. Kline:

On May 10 and 23, 1989, the Ohio Environmental Protection Agency (OEPA), representing the United States Environmental Protection Agency (U.S. EPA), conducted a Resource Conservation and Recovery Act (RCRA) inspection of the above referenced facility. The purpose of the inspection was to determine the compliance status of this facility with respect to the applicable hazardous waste management requirements of RCRA, including the land disposal restrictions of certain spent solvents (F001-F005) and dioxins which became effective on November 8, 1986, and certain hazardous wastes commonly referred to as California list wastes which became effective on July 8, 1987. Additionally, the land disposal restrictions for First Third of Scheduled Wastes became effective on August 8, 1988. Regulations are set forth in 40 CFR Part 268 and in revisions to 40 CFR Parts 260-265, 268, 270, and 271.

As a result of the inspection, it appears that the subject facility is in compliance with the land disposal requirements found at 40 CFR Part 268. However, OEPA's May 30, 1989, Notice of Violation does cite you for a failure to maintain a copy of the land disposal restriction notification form accompanying manifest #330852. We will follow-up with OEPA to ensure this record omission is remedied.

Thank you for your cooperation. If you have any questions concerning this letter, please contact Mr. Gregory T. Carlson of my staff at (312) 886-8095.

Sincerely yours,

Sally K. Swanson, Chief
IN/MN/OH Enforcement Program Section

Enclosure

cc: Mike Savage, OEPA
Harold O'Connell, NEDO

bcc: Sally Swanson, REB
5HR-12 carlson:pw:6-8093::DISK "A" :FILENAME:kline

Pw
8/8

RCRA ENFORCE-MENT	REB STAFF	REB SECTION CHIEF	REB CHIEF
INIT. DATE	TTC 8/8/84	SKS 8-9-84	

RCRA LAND DISPOSAL RESTRICTION INSPECTION

Facility: Graphic Packaging Corporation

U.S. EPA I.D. No.: OHD 058 394 313

Street: 708 South Avenue

City: Franklin State: Ohio Zip Code: 45005-0308

Telephone: (513) 746-4511

Operator: above

Street:

City: State: Zip Code:

Telephone:

Owner:

Street:

City: State: Zip Code:

Telephone:

Inspection Date: 5/23/89 Time: 10:00 a.m. Weather Conditions: overcast, rain

	Name	Affiliation	Telephone
Inspectors:	HAROLD OConnell	OEPA/SWDO/EE II	(513) 449-6357
Facility Representatives:	Ron Kline		746-4511
	Rebecca Beverly		" " " "

	RCRA Status	F-Solvent	LDR Status California List	First Third
Generator		F003/F005		
Transporter				
Treater				
Storer				
Disposer				

INSPECTION SUMMARY

Graphic Packaging manufactures consumer packaging materials. F003/F005 generated as still bottoms from closed loop solvent recycling system.

RCRA LAND DISPOSAL RESTRICTION INSPECTION

APPLICABILITY CHECKLIST

Does the facility handle the following wastes?

		Gen.	Treat	Store	Disp.	Trans.
A.	F-Solvent Wastes					
1.	F001	____	____	____	____	____
2.	F002	____	____	____	____	____
3.	F003	✓	____	____	____	____
4.	F004	____	____	____	____	____
5.	F005	✓	____	____	____	____

Note: Use Appendix A to determine whether the facility is misclassifying any of its wastes.

B. California List Wastes N/A

1. Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains the following metals at concentrations greater than or equal to those specified

		Gen.	Treat	Store	Disp.	Trans.
Arsenic	500 mg/L	____	____	____	____	____
Cadmium	100 mg/L	____	____	____	____	____
Chromium VI	500 mg/L	____	____	____	____	____
Lead	500 mg/L	____	____	____	____	____
Mercury	20 mg/L	____	____	____	____	____
Nickel	134 mg/L	____	____	____	____	____
Selenium	100 mg/L	____	____	____	____	____
Thallium	130 mg/L	____	____	____	____	____

2. Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains free cyanides at concentrations greater than or equal to 1,000 mg/L

N/A

Gen.	Treat	Store	Disp.	Trans.
____	____	____	____	____

3. Liquid hazardous waste that has a pH of less than or equal to 2.0

N/A

____	____	____	____	____

4. Liquid hazardous waste that contains PCBs at concentrations greater than or equal to

N/A

50 ppm	____	____	____	____	____
500 ppm	____	____	____	____	____

Does the facility mix liquid hazardous waste that contains PCBs with other types of wastes?

N/A ____ Yes ____ No ____ NA

If yes, state reasons for mixing: ~~

_____

_____

5. Hazardous waste that contains HOCs greater than or equal to 1,000 mg/L (liquids) or 1,000 mg/kg (solids)

N/A

____	____	____	____	____

Note (1): The prohibitions of 268.32(a)(3) and (e) do not apply if the waste is also subject to the solvent restrictions of 268 Subpart C for a specific HOC.

Note (2): The effective date of regulation for liquid wastes with HOCs greater than or equal to 1,000 mg/L and less than 10,000 mg/L was July 8, 1987; the effective date for liquid wastes containing HOCs greater than or equal to 10,000 mg/L and solid wastes containing HOCs greater than 1,000 mg/kg is November 8, 1988.

C. First Third Wastes N/A

Note: (1) The detailed description for waste codes are listed in Appendix C.
(2) EPA has promulgated the treatment standards for the following waste code with *.

	Gen.	Treat	Store	Disp.	Trans.
F006*					
F007					
F008					
F009					
F019					
K001*					
K004*					
K008*					
K011					
K013					
K014					
K015*					
K016*					
K017					
K018*					
K019*					
K020*					
K021*					
K022*					
K024*					
K025*					
K030*					
K031					
K035					
K036*					
K037*					
K044*					
K045*					
K046*					

	Gen.	Treat	Store	Disp.	APP Trans.
K047*					
K048*					
K049*					
K050*					
K051*					
K052*					
K060*					
K061*					
K062*					
K069*					
K071*					
K073*					
K083*					
K084					
K085					
K086*					
K087*					
K099*					
K100*					
K101*					
K102*					
K103*					
K104*					
K106*					
P001					
P004					
P005					
P010					
P011					
P012					
P015					
P016					
P018					

	Gen.	Treat	Store	Disp.	APP Trans.
P020					
P030					
P036					
P037					
P039					
P041					
P048					
P050					
P058					
P059					
P063					
P068					
P069					
P070					
P071					
P081					
P082					
P084					
P087					
P089					
P092					
P094					
P097					
P102					
P105					
P108					
P110					
P115					
P120					
P122					
P123					
U007					
U009					

	Gen.	Treat	Store	Disp.	APP Trans.
U010					
U012					
U016					
U018					
U019					
U022					
U029					
U031					
U036					
U037					
U041					
U043					
U044					
U046					
U050					
U051					
U053					
U061					
U063					
U064					
U066					
U067					
U074					
U077					
U078					
U086					
U089					
U103					
U105					
U108					
U115					
U122					
U124					

	Gen.	Treat	Store	Disp.	APP Trans.
U129					
U130					
U133					
U134					
U137					
U151					
U154					
U155					
U157					
U158					
U159					
U171					
U177					
U180					
U185					
U188					
U192					
U200					
U209					
U210					
U211					
U219					
U220					
U221					
U223					
U226					
U227					
U228					
U237					
U238					
U248					
U249					

RCRA LAND DISPOSAL RESTRICTION INSPECTION

GENERATOR CHECKLIST

GENERATOR REQUIREMENTS

A. <u>BDAT Treatability Group - Treatment Standards Identification</u>

1. F-Solvent Wastes: Does the generator correctly determine the appropriate treatability group of the waste?

   ✓ Yes ____ No ____ NA

   If yes, check the appropriate treatability group.

   ____ Wastewaters containing solvents (less than or equal to 1% TOC by weight)
   ____ Pharmaceutical wastewater containing spent methylene chloride
   ✓ All other spent solvent wastes

2. California List Wastes: Does the generator correctly determine the appropriate treatment standard of the waste?

   N/A

   a. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 50 but less 500 ppm, is the treatment in accordance with existing TSCA thermal treatment regulations for burning in high efficiency boilers (40 CFR 761.60) or incineration (40 CFR 761.70)?

      ____ Yes ____ No ____ NA

      If yes, specify the method: _____

   b. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 500 ppm, is the waste incinerated or disposed of by other approved alternate methods (40 CFR 761. 60 (e))?

      ____ Yes ____ No ____ NA

      If yes, specify the method and state whether the facility has submitted a written request to the Regional Administrator or Assistant Administrator for an exemption from the incineration requirement:

      _____
      _____
      _____

3. First Third Wastes: Does the generator correctly determine the appropriate treatability group of the waste?

N/A

____ Yes ____ No ____ NA

If yes, check the appropriate treatability group.

____ Wastewater (less than 1% TOC by weight and less than 1% filterable solids)
____ Nonwastewaters

List the waste code and check the correct treatment standard group.

Waste Code	Wastewater	Nonwastewater

B. Waste Analysis

1. F-Solvent Wastes

a. Does the generator determine whether the F-solvent waste exceeds treatment standards?

✓ Yes ____ No ____ NA

How was this determination made?

- Knowledge of waste

✓ Yes ____ No

If yes, is any supporting data available for review? Describe how this is adequate. CONTRACT ANALYTICAL THROUGH TSD's → SRR(CWM), West Carrollton & Ashland Chemical

- TCLP

____ Yes ✓ No

If yes, provide the date of last test, the frequency of testing, and note any problems. Attach test results.

b. Does the F-solvent waste exceed applicable treatability group treatment standards upon generation [268.7(a)(2)]?

✓ Yes ____ No ____ NA

If yes, specify the waste stream: F003/F005

c. Does the generator dilute the F-solvent waste as a substitute for adequate treatment [268.3]?

____ Yes ✓ No ____ NA

d. How does the generator test F-solvent waste when a process or waste stream changes?

CONTRACT ANALYTICAL SERVICES THROUGH TSD FACILITY OR INDEPENDENT

2. California List Wastes

N/A a. Does the generator determine whether the waste is a liquid according to the Paint Filter Liquids Test (PFLT method 9095) as described by SW-846?

____ Yes ____ No ____ NA

b. If the waste is determined to be a liquid according to PFLT, is an absorbent added to the waste?

____ Yes ____ No ____ NA

What type of absorbent is used? _____

Check the types of waste to which absorbent is added.

____ Liquid hazardous waste having a pH less than or equal to 2

____ Liquid hazardous waste containing metals

____ Liquid hazardous waste containing free cyanides

c. Does the generator determine whether the concentration levels (not extract or filtrate) in the waste equal or exceed the prohibition levels or whether the waste has a pH of less than or equal to 2.0 based on:

- Knowledge of wastes

____ Yes ____ No ____ NA

If yes, is any supporting data available for review? Describe how this is adequate._____

_____

_____

- Testing

_____ Yes _____ No _____ NA

If yes, list test method used: _____

d. Does the generator determine if concentration levels in the PFLT filtrate exceed cyanide and metals concentration levels?

N/A

_____ Yes _____ No _____ NA

- If yes, list test method used and constituent and concentration levels that exceeded prohibition levels: _____

_____

_____

_____

e. Does the generator dilute the waste as a substitute for adequate treatment [268.3]?

_____ Yes _____ No _____ NA

3. First Third Wastes:

N/A

a. Does the generator correctly determine the appropriate treatment standard of the waste?

_____ Yes _____ No _____ NA

Note: The treatment standards for first third wastes are given in Appendix D.

b. Does the generator determine whether the First Third waste exceeds treatment standards upon generation?

_____ Yes _____ No _____ Soft hammer

If yes, specify the waste stream: _____

How was this determination made?

- Knowledge of waste

_____ Yes _____ No

If yes, is any supporting data available for review? Describe how this is adequate._____

_____

- TCLP

_____ Yes _____ No _____ NA

- Total Constituent Analysis

_____ Yes _____ No _____ NA

Provide the date of last test, the frequency of testing, and note any problems. Attach test results.

_____

_____

c. Does the generator dilute the waste as a substitute for adequate treatment [268.3]?

_____ Yes _____ No _____ NA

d. How does the generator test the waste when a process or waste stream changes?

_____

_____

_____

C. Management

1. On-Site Management

Is restrict waste or waste that exceeds the treatment standards treated, stored, or disposed on-site?

_____ Yes ✓ No

If yes, the TSD Checklist must be completed.

2. Off-Site Management

a. Does the generator ship any waste that exceeds the treatment standards to an off-site treatment or storage facility?

✓ Yes _____ No

b. Does the generator provide notification to the treatment or storage facility [268.7(a)(1)]?

✓ Yes _____ No

c. Does notification contain the following?

EPA Hazardous waste number(s)	✓ Yes	____ No
Applicable treatment standards	✓ Yes	____ No
Manifest number	✓ Yes	____ No
Waste analysis data, if available	✓ Yes	____ No

Identify off-site treatment or storage facilities: CWM-SRR, West Carrollton; Ashland Chemical Services; SAFETY KLEEN; Recovered Energy Connersville, Ind.

d. Does the generator ship any waste that meets the treatment standards to an off-site disposal facility?

____ Yes ✓ No

e. Does the generator provide notification and certification to the disposal facility [268.7(a)(2)]?

____ Yes ✓ No

f. Does notification contain the following?

EPA Hazardous waste number(s)	____ Yes	____ No
Applicable treatment standards	____ Yes	____ No
Manifest number	____ Yes	____ No
Waste analysis data, if available	____ Yes	____ No
Certification that the waste meets treatment standards	____ Yes	____ No

Identify off-site land disposal facilities: _____

_____

_____

g. Is the waste subject to a nationwide variance, case by case extension (268.5), or petition (268.6)?

____ Yes ____ No ✓ NA

h. If yes, does the generator provide notification to the off-site receiving facility that the waste is not prohibited from land disposal [268.7(a)(3)]?

____ Yes ____ No

i. If yes, does the notification contain the following information?

EPA Hazardous waste number	____ Yes	____ No
The corresponding treatment standards and all applicable prohibitions	____ Yes	____ No
Manifest number	____ Yes	____ No
Waste analysis data, if available	____ Yes	____ No
Date the waste is subject to the prohibitions	____ Yes	____ No

j. Does the generator retain copies of all notices and certifications for a period of 5 years? Per 8/3/89 telephone conversation with H. O'Connell (OEPA). X Yes X No (one exception- covered by OEPA in 5/30/89 letter to facility. TTC 8/3/89

D. Demonstration and Certification -- "Soft Hammer" Wastes

N/A a. Has the generator attempted to locate and contract with treatment and recovery facilities that provide treatment that yields the greatest environmental benefit [268.8(a)(1)]?

____ Yes ____ No

b. Has the generator submitted to the Regional Adminstration a demonstration and certification containing the following information to document its efforts to locate practically available treatment:

A list of facilities and facility officials contacted?	____ Yes	____ No
Addresses	____ Yes	____ No
Telephone Numbers	____ Yes	____ No
Contact dates	____ Yes	____ No

Attach a copy of the demonstration and certification

c. If the generator has determined that there is no practically available treatment for its wastes, has it sent documentation to EPA demonstrating why it was not able to obtain treatment or recovery for the waste?

____ Yes ____ No

If yes, attach a copy of written discussion.

d. Does the generator ship his waste off-site for treatment?

_____ Yes _____ No

Describe the type of treatment and treatment facilities _____

e. Did the generator send a copy of its demonstration and certification to the receiving facility with the first shipment of waste?

_____ Yes _____ No

f. Does the generator provide certification with each subsequent shipment of wastes?

_____ Yes _____ No

g. Does the generator provide the following notification to the receiving facility with each shipment of waste?

(i) EPA Hazardous waste number _____ Yes _____ No

(ii) Manifest number _____ Yes _____ No

(iii) Waste analysis data, if available _____ Yes _____ No

h. Does the generator retain copies of all notices, demonstrations, and certifications for a period of 5 years?

_____ Yes _____ No

E. Treatment Using RCRA 264/265 Exempt Units or Processes
(i.e., boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.)

Are treatment residuals generated from units or processes exempt under RCRA 264/265?

✓ Yes _____ No

If yes, list types of waste treatment units and processes:
Solvent Distillation Unit

RCRA LAND DISPOSAL RESTRICTION INSPECTION

TRANSPORTER CHECKLIST

TRANSPORTER REQUIREMENTS N/A

A. Does the transporter accumulate waste for more than 10 days [268.50(A)(3)]?

_____ Yes _____ No

If yes, check the appropriate regulatory status:
_____ Interim status for storage
_____ RCRA permit for storage

If no, describe inventory controls to ensure that wastes are not stored for more than 10 days: _____
_____
_____

B. Does the transporter mix, combine, or recontainerize wastes?

_____ Yes _____ No

C. Is the waste treated in an exempt treatment process on-site?

_____ Yes _____ No

RCRA LAND DISPOSAL RESTRICTION INSPECTION

TSD CHECKLIST

TSD REQUIREMENTS N/A

A. General Facility Standards

1. Does the waste analysis plan cover Part 268 requirements [264.13 or 265.13]?

   o F-solvent _____ Yes _____ No _____ NA

   o California List _____ Yes _____ No _____ NA

   o First Third _____ Yes _____ No _____ NA

2. Does the facility obtain representative chemical and physical analyses of wastes and residues?

   _____ Yes _____ No

   a. What date was the waste analysis plan last revised? _____

   b. Are analyses conducted on-site or off-site?

      _____ On-site _____ Off-site

      Identify off-site lab: _____
      _____
      _____

   c. Is F-solvent waste analyzed using TCLP?

      _____ Yes _____ No _____ NA

   d. Is First Third waste analyzed using the analytical method that is appropriate for the objective of the specified BDAT (i.e., total constituent analysis for destruction technologies and TCLP for stabilization/fixation technologies)?

      _____ Yes _____ No _____ NA

      Note: The appropriate analytical methods (TCLP or total constituent) for first third wastes with specified treatment standards are given in Appendix D.

   e. Describe the frequency of sampling: _____
      _____
      _____

APPENDIX A

SOLVENT IDENTIFICATION CHECKLIST

1. Does the handler generate any of the following F001 constituents (i.e., spent halogenated solvents used in degreasing) as a result of being used in the process either in pure form or commercial grade?

tetrachloroethylene	___Yes	_✓_No
trichloroethylene	___Yes	_✓_No
methylene chloride	___Yes	_✓_No
1,1,1-trichloroethane	___Yes	_✓_No
carbon tetrachloride	___Yes	_✓_No
chlorinated fluorocarbons	___Yes	_✓_No

2. Does the handler generate any of the following F002 constituents (i.e., spent halogenated solvents) as a result of being used in the process either in pure form or commercial grade?

tetrachloroethylene	___Yes	_✓_No
trichloroethylene	___Yes	_✓_No
methylene chloride	___Yes	_✓_No
1,1,1-trichloroethane	___Yes	_✓_No
chlorobenzene	___Yes	_✓_No
trichlorofluoromethane	___Yes	_✓_No
1,1,2-trichloro-1,2,2-trifluoroethane	___Yes	_✓_No
ortho-dichlorobenzene	___Yes	_✓_No

3. Does the handler generate any of the following F003 constituents (i.e., spent nonhalogenated solvents) as a result of being used in the process either in pure form or commercial grade?

xylene	_✓_Yes	___No
acetone	___Yes	_✓_No
ethyl acetate	___Yes	_✓_No
ethyl benzene	___Yes	_✓_No
ethyl ether	___Yes	_✓_No
methyl isobutyl ketone	___Yes	_✓_No
n-butyl alcohol	_✓_Yes	___No
cyclohexanone	___Yes	_✓_No
methanol	___Yes	_✓_No

If the F003 waste stream has been mixed with a solid waste, does the resultant mixture exhibit the ignitability characteristic? _✓_Yes ___No

If yes, list the constituents.

_____

_____

(e) Are the constituents used for fabric scouring?

____Yes ____No

If yes, list the constituents.

_____

_____

(f) Are the constituents used as reaction and synthesis media?

____Yes ____No

If yes, list the constituents.

_____

_____

If the responses to questions 1 through 6 led the inspector to believe that the waste may be an F-solvent, answer question 7.

7. Are any of the above constituents spent solvents? (A solvent is considered "spent" when it has been used and is no longer usable without being regenerated, reclaimed, or otherwise reprocessed.) ✓Yes ____No

8. If the waste is a mixture of constituents as determined in questions 1 through 6, give the concentration before use of all the constituents in the solvent mixture/blend. For example:

5%	methylene chloride
2%	trichloroethylene
25%	1,1,1-trichloroethane
68%	mineral spirits
100%	

If the waste stream is a mixture containing a total of 10% or more (by volume) of one or more of the F001, F002, F004, or F005 listed constituents before use, it is a listed waste.

With respect to the F003 solvent wastes, if, before use, the waste stream is mixed and contains only F003 constituents, it is a listed waste. For example:

33%	acetone
16%	methanol
51%	ethyl ether
100%	

If the waste stream is a mixture containing F003 constituents and a total of 10% or more of one or more of the F001, F002, F004, and F005 listed constituents before use, it is a listed waste. For example:

50%	xylene (F003)
12%	TCE (F001)
38%	mineral spirits
100%	

If in light of the above, the handler appears to be generating F001 - F005 hazardous wastes, refer this facility to the enforcement official for followup actions verifying the use of solvents at the facility.

OhioEPA
State of Ohio Environmental Protection Agency
Southwest District Office
40 South Main Street
ayton, Ohio 45402-2086
(513) 449-6357
FAX (513) 449-6249

Richard F. Celeste
Governor

GMEL
INSP
LBMK
155

May 30, 1989

RE: GRAPHIC PACKAGING CORPORATION
HAZARDOUS WASTE MANAGEMENT
WARREN COUNTY
OHD 058 394 313
GENERATOR LQG

Mr. Ron Kline
Graphic Packaging Corporation
708 South Avenue
P.O. Box 308
Franklin, Ohio 45055-0308

Dear Mr. Kline:

I visited the above referenced location on May 10, 1989 to conduct an inspection of the facility's compliance with those state and federal regulations applicable to "generators" of hazardous waste. I met with Mr. John Spice and Mr. John Bishop, whom accompanied me on a walk through of facility operations. Your absence at that time prompted me to return again on May 23, 1989 to conduct a review of the facility's records associated with the hazardous waste management program currently implemented onsite.

In addition to the annual compliance evaluation a Land Disposal Restrictions (LDR) inspection was conducted, the findings of which are currently being forwarded to USEPA Region V for appropriate review and follow-up. Copies of these forms completed in my review of the facility's compliance status are enclosed for your records.

Based upon the information/observations required from these visits the following violations/deficiencies were noted. Actual violations of the Ohio Administrative Code (OAC) and corresponding Code of Federal Regulations (40 CFR) are prefaced by specific citations.

MANIFESTING - General Requirements OAC 3745-52-20
40 CFR 262.20

Review of those manifests generated from shipments of hazardous waste originating at the facility indicated omission of hazardous waste codes on manifest #330852. Additionally, a copy of the form addressing the land disposal restrictions accompanying this shipment was not retained within facility records.

Request that you submit documentation within 30 days of receipt of this letter to substantiate that proper remediation of this manifest discrepancy has occurred.

MANAGEMENT OF CONTAINERS OAC 3745-66-73(A)
40 CFR 265.173(a)

During the May 23 visit a container used for storing solids screened from the solvent recovery unit was observed without a lid. At that time we discussed those regulations which address proper management of containers used for storing hazardous waste and facility employees promptly secured a lid onto the drum in question. Request that you inform those employees involved in the solvent recovery operation of the responsibility in assuring that all containers used for such storage are kept closed except when it is necessary to add or remove waste.

PERSONNEL TRAINING OAC 3745-65-17(D)(E)
40 CFR 265.16(d)(e)

Review of the personnel training program pertaining to hazardous waste management within the facility indicates omission of job descriptions for each of those positions which facilitate such training.

Request that you revise the personnel training section contained within the contingency plan to incorporate a brief description of those duties/responsibilities associated with each position included within the training program. Submit such revisions within 45 days of receipt of this letter.

As you are aware, once revisions occur within the contents of the contingency plan it is mandated by the regulations (OAC 3745-65,53; 40 CFR 265.53) that all local emergency service authorities receive copes of such changes to the original plan. Therefore, request that you submit to our offices within 45 days of receipt of this letter copies of those cover letters which accompanied these revisions in their distribution to the appropriate authorities.

Those deficiencies noted during my review of the contents of the contingency plan are outlined within the attached checklists. I

believe that proper consideration of the suggestions provided would serve to enhance the effectiveness of the current plan. If you have any questions concerning any of the issues addressed within this communication please don't hesitate to contact me.

Sincerely,

Harold O'Connell

Harold O'Connell
Solid and Hazardous Waste Management Unit

HO/bjb

RECEIVED

FEB 24 1989

Environmental Protection Ag...

RCRA INTERIM STATUS INSPECTION FORM

Facility Name: Graphic Packaging Corporation
Address: 708 South Ave. P.O. Box 308
Franklin OH 45005-0308
County: WARREN
Facility Contact: Ron KLINE
Inspector(s)Name(s): HAROLD O'Connell OEPA/E&II

Date of Inspection: 5/10/89 12:10-Physical
HWFB #: 5/23/89 10:00-Document Review
USEPA ID #: OHD 058 394 313
Facility Phone #: 746-9511
Facility Contact Phone#:
Safety Equipment #:
* MET WITH John Spree
John Brewer for physical inspection

STATUS
Cond. Ex. SQG___ SQG___ Generator ✓ Transporter___ Treatment___ Storage___ Disposal___
ACTIVITIES
Containers___ Tanks___ Surface Impoundments___ Incineration/Thermal treatment___
Waste pile___ Land treatment___ Landfill___ Groundwater monitoring___
Used oil burner___ Hazardous waste fuel burner/blender___

	Y/N/NA	REMARK #
1. Does the facility produce "discarded materials" as defined in 3745-51-02(A)?	Y	
2. Are they :		
a. Abandoned(disposed;incinerated;accumulated, stored, or treated prior to disposal)?	Y	
b. Recycled?	Y	
c. Inherently waste-like?(F020,F021,F022,F023,F026,F028)?	N	
3. If recycled or accumulated, treated or stored before recycling, is the waste:		
a. Used in a manner constituting disposal?	N	
b. Burned for energy recovery?	N	
c. Reclaimed? (Refer to Table 1 of 3745-51-02)	Y	
d. Accumulated speculatively?	N	
4. Is the material recycled by being:		
a. Used or reused as an ingredient in an industrial process to make a product without prior reclamation?	N	
b. Used as an effective substitute for commercial products?	N	
c. Returned to the original process from which it was generated without prior reclamation as a substitute for a raw material feedstock?	N	

	Y/N/NA	REMARK #
5. Are LDR wastes generated? If so, complete appropriate LDR checklist.	Y	
6. Has the facility submitted a Part A to Ohio?	N	Generator Status
7. If yes, is it complete and accurate?	N/A	
8. If not accurate, has a PCR been submitted? If yes, what date was the PCR submitted?	N/A	
9. Is the facility operating in compliance with the terms and conditions of its HWFB permit?	N/A	
10. Has the facility submitted a Part B?	N/A	
11. Was advance notice of the inspection given? If so, how far in advance?	NO	

REMARKS. GENERAL INFORMATION.

Include list of wastes being generated/managed at the site and a brief description of site activity and waste handling.

F003 / F005 mixed print waste, solvents/still bottoms

Facility has large capacity solvent reclamation still. Closed loop to AG tank

New tank battery (Above Ground) currently under construction.

Existing AG Tanks with Temporary Containment are connected and integral to Solvent Reclamation System.

"Generator" closure of these Tanks will commence once new storage tank battery is completed.

OAC 3745-52 GENERATOR REQUIREMENTS (40 CFR Part 262)	Y/N/NA	REMARK #
1. Have the wastes generated at this facility been evaluated as required under 3745-52-11 (262.11)?	Y	ASHLAND SRR
2. Does this facility generate any hazardous wastes that are excluded from regulation under 3745-51-04 (261.4)?		
3. Does this facility have waste or waste treatment equipment that is excluded from regulation because of totally enclosed treatment [3745-65-01] (265.1(c)(9)) or via operation of an elementary neutralization unit and/or wastewater treatment unit [3745-65-01] (265.1(c)(10))?	Y	CLOSED LOOP Solvent Reclamation Process
4. Is the generator classified as a Small Quantity Generator (SQG) or conditionally exempt SQG? If so, complete appropriate checklist.	N/A	
5. Does the generator meet the following requirements with respect to the preparation, use and retention of the hazardous waste manifest:		
a. All hazardous wastes shipped off-site have been accompanied by a completed manifest using the most recently revised USEPA form 8700-22?	Y	
b. The manifest form used contains all the information required by 3745-52-20 (262.20) and the minimum number of copies required by 3745-52-22 (262.22)?	N	#330852 → 5-22-89 #330672 → 2-13-89
c. The generator has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with 3745-52-20(C)(D)(E) (262.20)?	Y	
d. Prepared manifests have been signed by the generator and initial transporter in compliance with 3745-52-23(A)(1&2) (262.23)?	Y	
e. The generator has complied with manifest exception reporting requirements in 3745-52-42 (262.42(a))?	Y	
f. Signed copies of all hazardous waste manifests and any documentation required for Exception Reports are retained for at least 3 years as required by 3745-52-40.(262.40)?	Y	

	Y/N/NA	REMARK #
6. Does the generator meet the following hazardous waste pre-transport requirements:		
a. Prior to offering hazardous wastes for transport off-site, the waste material is packaged, labeled, and marked in accordance with applicable DOT regulations [3745-52-30, 3745-52-31, and 3745-52-32] (262.30, 262.31, 262.32)?	Y	
b. Prior to offering hazardous waste for transport off-site, each container with a capacity of 110 gallons or less is affixed with a completed hazardous waste label as required by 3745-52-32 (262.32)?	Y	
c. Prior to offering hazardous wastes for transport off-site, the generator meets requirements for properly placarding or offering to properly placard for the initial transporter of the waste material in compliance with 3745-52-33 (262.33)?	Y	
7. Does the generator import or export hazardous waste?	N	
If so, are the wastes handled in accordance with the requirements of 3745-52-50 (262.50)?	N/A	
8. If the generator elects to accumulate hazardous waste on-site in containers or tanks for 90 days or less without a hazardous waste facility installation and operation permit as provided under 3745-52-34 (262.34), are the following requirements with respect to such accumulation met:		
a. The containers or tanks are clearly marked with the words "Hazardous Waste"?	Y	
b. The date that accumulation began is clearly marked on each container?	Y	
c. If the waste is accumulated in containers, the generator is complying with OAC 3745-66-71 to 3745-66-74 and 3745-66-76 to 3745-66-77? Complete Management of Containers checklist.	Y	

		Y/N/NA	REMARK #
d.	If the waste is accumulated in tanks, the generator is complying with OAC 3745-66-90, 3745-66-91, 3745-66-92, 3745-66-94, and 3745-66-97 to 3745-66-99 except OAC 3745-66-97(C)? Complete Storage and Treatment in Tanks checklist.		
e.	If the generator accumulates waste at or near the point of generation which is under the control of the operator of the process generating the waste as allowed by 3745-52-34(C) are the following requirements met:		
	1. Quantities of waste accumulated do not exceed 55 gallons at any time?	Y	
	2. Quantities of acutely hazardous waste accumulated do not exceed 1 quart at any one time?	N/A	
	3. If the generator is accumulating hazardous waste in accordance with e.1 or e.2, above, has the generator marked the containers with words "Hazardous Waste" or with other words identify the contents of the container and is the generator complying with OAC 3745-55-71, 3745-55-72, 3745-55-73(A), 3745-55-76, and 3745-55-77?	Y	
	4. If the generator accumulates hazardous wastes in excess of the amounts listed in either e.1 or e.2, above, did the generator comply with 3745-52-34(A) (262.34(a)) within three (3) days and mark the container holding the excess accumulation with the date the excess accumulation began accumulating?	N/A	
9.	Has the genertor accumulated hazardous wastes in excess of ninety (90) days?	N	
10.	Has the generator been granted an extension by the Director/ Regional Administrator for accumulation in excess of ninety (90) days?	N	
11.	Has the generator treated, stored, disposed of, transported or offered for transportation hazardous waste without having obtained a USEPA identification number from the Administrator as required under 3745-52-12 (262.12)?	N	

		Y/N/NA	REMARK #
12.	Does the generator provide a Personnel Training Program in compliance with 3745-65-16(A)(B)(C) (265.16) including instruction in safe equipment operation and emergency procedures, training new employees within 6 months and providing an annual training program refresher course? [3745-52-34(A)(4)] (262.34)	Y	
13.	Does the generator keep all of the records required by 3745-65-16(D)(E) (265.16) including written job titles, job descriptions and documented employee training records? [3745-52-34(A)(4)] (262.34)	Y	
14.	Has the generator filed annual reports on or before March 1st of the next calendar year as required by 3745-52-41?	Y	
15.	Does the generator comply with the applicable requirements for owners or operators of hazardous waste facilities? Complete "Preparedness and Prevention" and "Contingency Plan and Emergency Procedures" checklists.	Y	

REMARKS, GENERATOR REQUIREMENTS

OAC 3745-65-et seq. GENERAL FACILITY STANDARDS (40 CFR Part 265, SUBPART B)

	Y/N/NA	REMARK #
1. Does the owner/operator (o/o) have a detailed chemical and physical analysis of the waste material containing all of the information which must be known to properly treat or store the waste as required by 3745-65-13(A)(1) (265.13(a))?	Y	
2. Does o/o have a written waste analysis plan which describes analytical parameters, test methods, sampling methods, testing frequency and responses to any process changes that may affect the character of the waste. [3745-65-13(B)] (265.13(b))	N/A	
3. a. Would physical contact with the waste structures or equipment injure unknowing/unauthorized persons or livestock entering the facility? [3745-65-14(A)(1)] (265.14(a)(1))	N/A	
b. Would disturbance of the waste cause a violation of the hazardous waste regulations? [3745-65-14(A)(2)] (265.14(a)(2))	N/A	

IF BOTH 3A and 3B ARE NO, MARK QUESTIONS 4 AND 5 NOT APPLICABLE.

4. Does the facility have -		
a. A 24-hour surveillance system, or	N/A	
b. An artificial or natural barrier and a means to control entry at all times [3745-65-14(B)(2)(a and b)] (265.14(b)(2))	Y	
5. Does the facility have a sign "Danger-Unauthorized Personnel Keep Out" at each entrance to the active portion of the facility and at other locations as necessary. [3745-65-14(C)](265.14(c))	Y	
6. a. Has the o/o developed and followed a comprehensive, written inspection plan and documented the inspections, malfunctions and any remedial actions taken in an operating record log which is kept for at least three years. [3745-65-15] (265.15)	Y	

		Y/N/NA	REMARK #
b.	Are areas subject to spills (i.e., loading and unloading areas, etc.) inspected daily when in use and according to other applicable regulations when not in use. [3745-65-15(B)(4)] (265.15(b)(4))	Y	
7.	Has the o/o provided a Personnel Training Program in compliance with 3745-65-16(A)(B)(C) including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course. (265.16(a)(b)(c))	Y	
8.	Does o/o keep all records required by 3745-65-16(D)(E) including written job titles, job descriptions and documented employee training records. (265.16(d)(e))	N	job descriptions absent within contingency plan
9.	If Ignitable, Reactive or incompatible wastes are handled, does the facility meet the following requirements? [3745-65-17](265.17)		
a.	Protection from sources of ignition.	Y	
b.	Physical separation of incompatible waste materials.	N/A	
c.	"No Smoking" or "No Open Flames" signs near areas where Ignitable or Reactive wastes are handled.	Y	
d.	Comingling of waste materials is done in a controlled, safe manner as prescribed by 3745-65-17(B) (265.17(b)	N/A	

APPENDIX A

SOLVENT IDENTIFICATION CHECKLIST

1. Does the handler generate any of the following F001 constituents (i.e., spent halogenated solvents used in degreasing) as a result of being used in the process either in pure form or commercial grade?

tetrachloroethylene	___Yes	_✓_No
trichloroethylene	___Yes	_✓_No
methylene chloride	___Yes	_✓_No
1,1,1-trichloroethane	___Yes	_✓_No
carbon tetrachloride	___Yes	_✓_No
chlorinated fluorocarbons	___Yes	_✓_No

2. Does the handler generate any of the following F002 constituents (i.e., spent halogenated solvents) as a result of being used in the process either in pure form or commercial grade?

tetrachloroethylene	___Yes	_✓_No
trichloroethylene	___Yes	_✓_No
methylene chloride	___Yes	_✓_No
1,1,1-trichloroethane	___Yes	_✓_No
chlorobenzene	___Yes	_✓_No
trichlorofluoromethane	___Yes	_✓_No
1,1,2-trichloro-1,2,2-trifluoroethane	___Yes	_✓_No
ortho-dichlorobenzene	___Yes	_✓_No

3. Does the handler generate any of the following F003 constituents (i.e., spent nonhalogenated solvents) as a result of being used in the process either in pure form or commercial grade?

xylene	_✓_Yes	___No
acetone	___Yes	_✓_No
ethyl acetate	___Yes	_✓_No
ethyl benzene	___Yes	_✓_No
ethyl ether	___Yes	_✓_No
methyl isobutyl ketone	___Yes	_✓_No
n-butyl alcohol	_✓_Yes	___No
cyclohexanone	___Yes	_✓_No
methanol	___Yes	_✓_No

If the F003 waste stream has been mixed with a solid waste, does the resultant mixture exhibit the ignitability characteristic? _✓_Yes ___No

If yes, list the constituents.

_____

_____

(e) Are the constituents used for fabric scouring?

____Yes ____No

If yes, list the constituents.

_____

_____

(f) Are the constituents used as reaction and synthesis media?

____Yes ____No

If yes, list the constituents.

_____

_____

If the responses to questions 1 through 6 led the inspector to believe that the waste may be an F-solvent, answer question 7.

7. Are any of the above constituents spent solvents? (A solvent is considered "spent" when it has been used and is no longer usable without being regenerated, reclaimed, or otherwise reprocessed.) ✓Yes ____No

8. If the waste is a mixture of constituents as determined in questions 1 through 6, give the concentration before use of all the constituents in the solvent mixture/blend. For example:

5%	methylene chloride
2%	trichloroethylene
25%	1,1,1-trichloroethane
68%	mineral spirits
100%	

If the waste stream is a mixture containing a total of 10% or more (by volume) of one or more of the F001, F002, F004, or F005 listed constituents before use, it is a listed waste.

With respect to the F003 solvent wastes, if, before use, the waste stream is mixed and contains only F003 constituents, it is a listed waste. For example:

33%	acetone
16%	methanol
51%	ethyl ether
100%	

If the waste stream is a mixture containing F003 constituents and a total of 10% or more of one or more of the F001, F002, F004, and F005 listed constituents before use, it is a listed waste. For example:

50%	xylene (F003)
12%	TCE (F001)
38%	mineral spirits
100%	

If in light of the above, the handler appears to be generating F001 - F005 hazardous wastes, refer this facility to the enforcement official for followup actions verifying the use of solvents at the facility.

APPENDIX B
TREATMENT STANDARDS FOR F-SOLVENTS

F001-F005 SPENT SOLVENTS	CONCENTRATION (IN MG/L) WASTEWATERS	OTHER WASTES
Acetone	0.05	0.59
N-butyl	5.0	5.0
Carbon disulfide	1.05	4.81
Carbon tetrachloride	.05	.96
Chlorobenzene	.15	.05
Cresols (and cresylic acid)	2.82	.75
Cycohexanone	.125	.75
1,2-dichlorobenzene	.65	.125
Ethyl acetate	.05	.75
Ethyl benzene	.05	.053
Ethyl ether	.05	.75
Isobutanol	5.0	5.0
Methanol	.25	.75
Methylene chloride	.20	.96
Methylene chloride (from the pharmaceutical industry)	0.44	.96
Methyl ethyl ketone	0.05	0.75
Methyl isobutyl ketone	0.05	.33
Nitrobenzene	0.66	0.125
Pyridine	1.12	0.33
Tetrachloroethylene	0.079	0.05
Toluene	1.12	0.33
1,1,1-Trichloroethane	1.05	0.41
1,2,2-Trichlor 1,2,2-trifluoroethane	1.05	0.96
Trichloroethylene	0.062	0.091
Trichlorofluoromethane	0.05	0.96
Xylene	0.05	0.15

CMEL, 17, 122, CB

OhioEPA
State of Ohio Environmental Protection Agency
Southwest District Office
40 South Main Street
Dayton, Ohio 45402
(513) 449-6357

OHD 058 394 313

Richard F. Celeste
Governor

August 22, 1988

Re: GRAPHIC PACKAGING CORPORATION
FORMALLY "COLORPAC, INC."
HAZARDOUS WASTE MANAGEMENT
OHD 058 394 313
WARREN COUNTY
GENERATOR

Mr. Ron Kline
Manager of Administration
Graphic Packaging Corp.
708 S. Avenue
P.O. Box 308
Franklin, Ohio 45005-0308

Dear Mr. Kline:

On August 16, 1988, I visited your company to conduct a Hazardous Waste Generator Compliance Evaluation Inspection in accordance with State and Federal Hazardous Waste Rules and Regulations.

During the inspection, the following violations were found (OAC - Ohio Administrative Code, CFR - Code of Federal Regulations):

1. The hazardous waste that is being shipped off-site is not being properly characterized. Currently, all wastes are being designated as D001 - "ignitable". According to waste profile sheets, Graphic Packaging generates USEPA Waste Numbers F003/F005. Your company must properly characterize the wastes as required by CFR 262.11 and OAC 3745-52-11(D). To correct this violation, Graphic Packaging must correctly identify its' wastes and list the appropriate USEPA "F" Waste Number on the hazardous waste manifests and on any other document that is required. Graphic Packaging must submit a document explaining how it intends on correcting this violation, by September 6.

2. Graphic Packaging must maintain records including written job titles, job descriptions and documented employee training records as required by CFR 262.34 and OAC 3745-52-34(A)(4). A review of company records shows that the above requirements are not being met. To correct this violation, Graphic Packaging must prepare written job titles and job descriptions for all employees involved in the management of hazardous

wastes. These documents should be incorporated into the Contingency Plan and Personnel Training Plan. Submit the required documents to this office by September 6.

According to conversations with you and Harry Miesel (engineering consultant), Graphic Packaging will be removing off-site several hazardous waste tanks. Whenever a tank is permanently taken out of service or upon closure of the facility, all hazardous wastes and residues must be removed and properly disposed of as required by CFR 265.197 and OAC 3745-66-97.

Graphic Packaging must submit a work-plan for the removal of the tanks. The plan should detail the procedural steps that will be taken to have the tanks emptied and cleaned. This plan must be submitted before any work is done to the tanks. A time schedule of activities should be incorporated into the plan. The consultant should contact this District Office for regulatory requirements and guidance.

The installation of new tanks on-site will require a change of the Contingency Plan. The plan must describe the usage of the new tanks. The locations of the tanks must be plotted on a facility map. The plan must be revised in response to equipment changes as required by CFR 265.54 and OAC 3745-65-54. Submit a revised Contingency Plan to this District Office for review before sending other copies to the required emergency authorities. The submittal is due by September 6.

According to Ohio EPA and USEPA records, Graphic Packaging Corporation was formally known as Colorpac Incorporated. Whenever an ownership changes, the agencies should be notified of such a change. Graphic Packaging must submit a subsequent notification using USEPA Form 8700-12 (enclosed). Submit a photocopy of the form that will have been sent to USEPA Region V to this office by September 6.

Graphic Packaging is currently accumulating its' hazardous wastes on top of a gravel paved earth. It is highly recommended that the wastes should be stored on a concrete pad. In addition, all cracks on the concrete pad beneath the solvent reclamation system should be sealed immediately.

On the day of the inspection, a USEPA Land Disposal Restriction Inspection was completed. Copies of the inspection form is being forwarded to USEPA.

Failure to list any other violations does not relieve Graphic Packaging from meeting State and Federal Hazardous Waste Rules and Regulations.

Enclosed are photocopies of the forms used in the inspection.

Should you have any questions, I may be contacted at 449-6357.

Sincerely,

Chul Kim-McGuire

Chul Kim-McGuire
Division of Solid & Hazardous Waste Management

cc: Dave Sholtis, CO, DSHWM

5/16/88 — 0855
Date/and Time of Inspection

RCRA INTERIM STATUS INSPECTION FORM

HWFAB #

GENERAL INFORMATION

U.S. EPA I.D. # OH D058394313

Facility: GRAPHIC PACKAGING CORP. Address: 708 S. AVENUE ; P.O. BOX 308 City: FRANKLIN

State: OHIO Zip Code: 45005-0308 County: WARREN Telephone: (513) 746-4511

INSPECTION PARTICIPANT(S)

	(Name)	(Title)	(Telephone)
1.	RON KLINE	MANAGER OF ADMINISTRATION	(513) (800) 433-6792 (WATS)
2.			
3.			

INSPECTOR(S)

1.	Chul Kim-McGuire	HWI - EE1	(513) 449-6357
2.			
3.			

INSTALLATION ACTIVITY

Mark One

- [X] Generator only (G)
- [ ] Transporter (T)
- [ ] TSDF only
- [ ] G-T
- [ ] G-TSDF
- [ ] T-TSDF
- [ ] G-T-TSDF

If the site is a TSDF, check the boxes indicating which areas were reviewed.

- [ ] General Facility Standards, Preparedness and Prevention, Contingency and Emergency Manifests/Records/Reporting, Closure
- [ ] Containers S01
- [ ] Tanks S02/T01
- [ ] Surface Impoundments S04/T02
- [ ] Incineration/Thermal Treatment
- [ ] Waste Piles S03
- [ ] Land Treatment D81
- [ ] Landfills D80
- [ ] Chemical/Physical/Biological T04
- [ ] Groundwater Monitoring
- [ ] Post-Closure

RCRA INTERIM STATUS INSPECTION FORM

	Yes	No	N/A	Remark #
1. Has the facility submitted a Part A to Ohio?	___	___	✓	___
2. If "yes", is it complete and accurate?	___	___	✓	___
3. Has the facility submitted a Part B?	___	___	✓	___
4. Was advance notice of the inspection given? If so, how far in advance?	✓	___	___	* 2 weeks

IF THE SITE HAS RECEIVED A PART B PERMIT, USE THE RCRA STATUS INSPECTION FORM.

REMARKS, GENERAL INFORMATION

Include a brief description of site activity and waste handling. –

Previous inspection on 9/23/86. Printing company.

* Ohio EPA was contacted by consultants to the company regarding tank regulations. Arrangements were made to do our inspection of current waste handling activities.

Waste Streams: F003, F005, (D001)
Print wastes

* formally known as Color-Pac

→ Need to re-notify of Co. name change (USEPA Form 8700-12) Subsequent Notification

* will be removing/decommissioning some tanks (265.197)

RCRA INTERIM STATUS INSPECTION FORM

40 CFR 262 (OAC 3745-52) GENERATOR REQUIREMENTS

	Yes	No	N/A	Remark #
*(1) The hazardous waste(s) generated at this facility have been tested or are acknowledged to be hazardous waste(s) as defined in Section 261 and in compliance with the requirements of Sections 262.11. [3745-52-11(D)]		✓		
2. Does this facility generate any hazardous wastes that are excluded from regulation under Section 261.4 [3745-51-04] (statutory exclusions) or Section 261.6 [3745-51-06(A)(1)] (recycle/reuse)?	✓			recycles solvents (air emissions)
3. Does this facility have waste or waste treatment equipment that is excluded from regulation because of totally enclosed treatment (Section 265.1(c)(9)) [3745-65-01] or via operation of an elementary neutralization unit and/or wastewater treatment unit (Section 265.1(c)(10) [3745-65-01]			✓	
4. The generator meets the following requirements with respect to the preparation, use and retention of the hazardous waste manifest:				
a) The manifest form used contains all of the information required by Section 262.21(a) and (b) [3745-52-21] and the minimum number of copies required by Section 262.22 [3745-52-22].	✓			
b) The generator has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with Section 262.20 [3745-52-20(B)(C)(D)].	✓			
c) Prepared manifests have been signed by the generator and initial transporter in compliance with Section 262.23 [3745-52-23(A)(1 and 2)].	✓			
d) The generator has complied with manifest exception reporting requirements (investigate after 35 days, report after 45 days) in Section 262.42(a)(b) [3745-52-42].			✓	
e) Signed copies of all hazardous waste manifests and any documentation required for Exception Reports are retained for at least 3 years as required by Section 262.40 [3745-52-40]. (262.40(a)) [3745-52-40(a)]	✓			

	Yes	No	N/A	Remark #
5. The generator meets the following hazardous waste pre-transport requirements:				
a) Prior to offering hazardous wastes for transport off-site the waste material is packaged, labeled and marked in accord with applicable DOT regulations (Section 262.30, 262.31 and 262.32(a)) [3745-52-30, 3745-52-31, 3745-52-32]	✓			
b) Prior to offering hazardous wastes for transport off-site each container with a capacity of 110 gallons (416 liters) or less is affixed with a completed hazardous waste label as required by Section 262.32(b) [3745-52-32].	✓			
c) The generator meets requirements for properly placarding or offering to properly placard the initial transporter of the waste material in compliance with Section 262.33 [3745-52-33].	✓			
6. Hazardous wastes imported from or exported to foreign countries are handled in accordance with the requirements of Section 262.50 [3745-52-50]			✓	
7. If the generator elects to store hazardous waste on-site in containers or tanks for 90 days or less without a RCRA storage permit as provided under Section 262.34 [3745-52-34], the following requirements with respect to such storage are met:				
a) The containers are clearly marked with the words "Hazardous Waste".	✓			
b) The date that accumulation began is clearly marked on each container.	✓			
8. The generator has provided a Personnel Training Program in compliance with Section 265.16(a)(b)(c) [3745-65-16(A)(B)(C)] including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course. (Section 262.34) [3745-52-34(A)(4)]	✓			
* (9) The generator keeps all of the records required by Section 265.16(d)(e) [3745-65-16(D)(E)] including written job titles, job descriptions and documented employee training records (Section 262.34) [3745-52-34(A)(4)].		✓		

NOTE: SHORT-TERM STORAGE FOR 90 DAYS OR LESS IN TANKS AND CONTAINERS ALSO REQUIRES THAT REGULATIONS IN SECTION 265 [3745-65], SUBPARTS C AND D (PREPAREDNESS AND PREVENTION PLUS CONTINGENCY AND EMERGENCY) AND CERTAIN PORTIONS OF THE "CONTAINERS" AND "TANKS" RULES BE MET. COMPLETE THE APPROPRIATE SECTIONS OF THE INSPECTION FORM.

REMARKS, GENERATOR REQUIREMENTS

RCRA INTERIM STATUS INSPECTION FORM

Subpart C: Preparedness and Prevention

	Yes	No	N/A	Remark #
1. Has there been a fire, explosion or non-planned release of hazardous waste at this facility? (265.31) [3745-65-31]		✓		
2. If required due to actual hazards associated with the waste material, the facility has the following equipment: (265.32) [3745-65-32(A)(B)(C)(D)]				
a) Internal alarm system.	✓			
b) Access to telephone, radio or other device for summoning emergency assistance.	✓			
c) Portable fire control equipment.	✓			
d) Water of adequate volume and pressure via hoses sprinkler, foamers or sprayers.	✓			
3. All required safety, fire and communications equipment is tested and maintained as necessary; testing and maintenance are documented. (265.33) [3745-65-33]	✓			
4. If required due to the actual hazards associated with the waste material, personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled. (265.34) [3745-65-34]	✓			
5. If required due to the actual hazards associated with the waste material, adequate aisle space to allow unobstructed movement or emergency or spill control equipment is maintained. (265.35). [3745-65-35]	✓			
6. If required due to the actual hazards associated with the waste material, the facility has attempted to make appropriate arrangements with local emergency service authorities to familiarize them with the possible hazards and the facility layout. (265.37(a)) [3745-65-37(A)]	✓			
7. Where state or local emergency service authorities have declined to enter into any proposed special arrangements or agreements the refusal has been documented. (265.37(b)) [3745-65-37(B)]			✓	

RCRA INTERIM STATUS INSPECTION FORM

Subpart D: Contingency and Emergency

	Yes	No	N/A	Remark #
1. The facility has a written Contingency Plan designed to minimize hazards from fire, explosions or unplanned releases of hazardous wastes (265.51) [3745-65-52(A)(B)(C)(D)(E)] and contains the following components:				
a) Actions to be taken by personnel in the event of an emergency incident.	✓			
b) Arrangements or agreements with local or state emergency authorities.	✓			
c) Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator.	✓			
d) A list of all emergency equipment including location, physical description and outline of capabilities.	✓			
e) If required due to the actual hazards associated with the waste(s) handled, an evacuation plan for facility personnel. (265.51(f)) [3745-65-52(F)]	✓			
2. A copy of the Contingency Plan and any plan revisions is maintained on-site and has been submitted to all local and state emergency service authorities that might be required to participate in the execution of the plan. (265.53) [3745-65-53(A)(B)]	✓			
✳ 3. The plan is revised in response to facility equipment and personnel changes or failure of the plan. (265.54) [3745-65-54]		✓		
4. An emergency coordinator is designated at all times (on-site or on-call) is familiar with all aspects of site operation and emergency procedures and has the authority to implement all aspects of the Contingency Plan. (265.56) [3745-65-55]	✓			
5. If an emergency situation has occurred, the emergency coordinator has implemented all or part of the Contingency Plan and has taken all of the actions and made all of the notifications deemed necessary under Sections 265.56(a-j). [3745-65-56(A-J)			✓	

RCRA INTERIM STATUS INSPECTION FORM

Subpart I: Management of Containers

	Yes	No	N/A	Remark #
1. Hazardous wastes are stored in containers which are:				
a) Closed (265.173) [3745-66-73(A)]	✓			
b) In good physical condition (265.171) [3745-66-71]	✓			
c) Compatible with the wastes stored in them (265.172) [3745-66-72]	✓			
2. Containers are stored closed except when it is necessary to add or remove wastes. (265.173(a)) [3745-66-73(A)]	✓			
3. Hazardous waste containers are stored, handled and opened in a manner which prevents container rupture or leakage. (265.173(b)) [3745-66-73(B)]	✓			
4. The area where containers are stored is inspected for evidence of leaks or corrosion at least weekly and such inspections are documented. (265.174) [3745-66-74]	✓			
5. Containers holding Ignitable or Reactive waste(s) are located at least 50 feet (15 meters) from the property line and the general requirements for handling such wastes in Section 265.17 (physical separation, signs and safety) are met (265.176) [3745-66-76]	✓			
6. Containers holding hazardous wastes are stored separate from other materials which may interact with the waste in a hazardous manner. (265.177(c)) [3745-66-77(C)]	✓			

Containers are accumulated on gravel-paved road.

Subpart J: Storage in Tanks

	Yes	No	N/A	Remark #
1. The tank(s) are operated in compliance with the safety requirements of Sections 265.17 and 265.192(b) [3745-66-92(B)] and are equipped with a waste-feed cutoff or bypass system as required in Section 265.192(d) [3745-66-92(D)].	✓			
2. Uncovered tanks have at least 2 feet (60 cm.) of freeboard unless they are equipped with a spill containment system with a capacity that equals or exceeds the volume that 2 feet of freeboard would otherwise provide. (265.192(c)) [3745-66-92(C)]			✓	
3. Daily inspections are made of all systems pertinent to the proper operation of the tank: discharge and cutoff, monitoring equipment, tank level and freeboard. (265.194) [3745-66-94(A)(B)(C)]	✓			
4. Weekly inspections are made of all tank construction materials and containment structures. (265.194) [3745-66-94(D)(E)]	✓			
5. Whenever tanks are used to treat or store wastes substantially different from previous wastes or when substantially different treatment processes are used in the tank, the facility has insured the safety of such changes by one or both of the following methods: (265.193(a)) [3745-66-93(A)(B)]				
a) A complete waste analysis plus bench scale tests or pilot tests were conducted prior to implementing the proposed changes and all data is on file in the facility operating record.			✓	
b) Written, documented information on similar storage or treatment process changes was obtained prior to implementing the proposed changes and all documentation is on file in the facility operating record.			✓	

	Yes	No	N/A	Remark #
6. With the exception of emergency situations, whenever Ignitable or Reactive wastes are placed in tanks the facility has insured the safety of the operation by one or both of the following methods: (265-198(a)) [3745-66-98(A)]				
a) The waste is treated immediately before or after being placed in the tank so that it is no longer Ignitable or Reactive and such treatment is done in compliance with the safety requirements of Section 265.17(b) [3745-65-17(B)].			✓	
b) The waste is stored or treated under protected conditions eliminating the possibility of ignition or reaction.	✓			
7. Covered tanks used to treat or store Ignitable or Reactive wastes are in compliance with NFPA buffer zone requirements (Flammable and Combustible Code 1977). (265.198(b)) [3745-66-98(B)]	✓			
8. Incompatible waste materials are placed in the same tanks or put in contaminated tanks only under completely controlled and safe conditions as specified in Section 265.17(b). (265.199) [3745-66-99(A)(B)]			✓	
(9) Whenever a tank is permanently taken out of service or upon closure of the facility all hazardous wastes and residues are removed and properly disposed of. (265.197) [3745-66-97)]	* ✓			

* Tanks are going through "closure" process

Generator - closure

RCRA LAND DISPOSAL RESTRICTION INSPECTION

Facility: GRAPHIC PACKAGING CORPORATION / "CELOTEX"

U.S. EPA I.D. No.: OHD058394313

Street: 708 S. AVENUE

City: FRANKLIN State: OH Zip Code: 45005-0308

Telephone: (800) 433-6792

Operator: SAME AS ABOVE

Street: _____

City: _____ State: _____ Zip Code: _____

Telephone: _____

Owner: _____

Street: _____

City: _____ State: _____ Zip Code: _____

Telephone: _____

Inspection Date: 8/16/88 Time: 08 - 5? Weather Conditions: VERY HOT

	Name	Affiliation	Telephone
Inspectors:	CHUL KIM McGUIRE	OHIO EPA	(513) 449-0357
Facility Representatives:	RON KLINE		

	RCRA Status	LDR Status: F-Solvent	LDR Status: California List
Generator	✓	✓	
Transporter			
Treater			
Storer			
Disposer			

Printing company.

Solvent wastes, still bottoms

F003/ F005, D001

RCRA LAND DISPOSAL RESTRICTION INSPECTION

APPLICABILITY CHECKLIST

Does the facility handle the following wastes?

		Gen.	Treat	Store	Disp.	Trans.
A.	F-Solvent Wastes					
1.	F001	____	____	____	____	____
2.	F002	____	____	____	____	____
3.	F003	√	____	____	____	____
4.	F004	____	____	____	____	____
5.	F005	√	____	____	____	____

Note: Use Appendix A to determine whether the facility is misclassify any of its wastes.

N/A B. California List Wastes

1. Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains the following metals at concentrations greater than or equal to those specified

Arsenic	500 mg/L	____	____	____	____	____
Cadmium	100 mg/L	____	____	____	____	____
Chromium VI	500 mg/L	____	____	____	____	____
Lead	500 mg/L	____	____	____	____	____
Mercury	20 mg/L	____	____	____	____	____
Nickel	134 mg/L	____	____	____	____	____
Selenium	100 mg/l	____	____	____	____	____
Thallium	130 mg/L	____	____	____	____	____

N/A 2. Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains free cyanides at concentrations greater than or equal to 1,000 mg/L

_____ _____ _____ _____ _____

N/A 3. Liquid hazardous waste that has a pH less than or equal to 2.0

_____ _____ _____ _____ _____

N/A 4. Liquid hazardous waste that contains PCBs at concentrations greater than or equal to

50 ppm _____ _____ _____ _____ _____

500 ppm _____ _____ _____ _____ _____

Does the facility mix liquid hazardous waste that contains PCBs with other types of wastes?

_____ Yes _____ No _____ NA

If yes, state reasons for mixing:

_____

_____

N/A 5. Liquid hazardous waste that is primarily water and that contains HOCs greater than or equal to 1,000 mg/L and less than 10,000 mg/L

_____ _____ _____ _____ _____

Note: The prohibitions of 268.32(a)(3) and (c) do not apply if the HOC waste is also subject to the solvent restrictions of 268 Subpart C or a specific HOC.

RCRA LAND DISPOSAL RESTRICTION INSPECTION

GENERATOR CHECKLIST

GENERATOR REQUIREMENTS

A. BDAT Treatability Group - Treatment Standards Identification

1. F-solvents wastes: Does the generator correctly determine the appropriate treatability group of the waste?

   ✓ Yes ____ No ____ NA

   If yes, check the appropriate treatability group.

   ____ Wastewaters containing solvents (less than or equal to 1% TOC by weight)
   ____ Pharmaceutical wastewater containing
   ✓ spent methylene chloride
   ____ All other spent solvent wastes

N/A 2. California List Wastes: Does the generator correctly determine the appropriate treatment standard of the waste (only PCB wastes have treatment standards)?

   a. For liquid hazardous waste containing PCBs at concentrations greater than or equal to 50 but less 500 ppm, is the treated in accordance with existing TSCA thermal treatment regulations for burning in high efficiency boilers (40 CFR 761.60) or incineration (40 CFR 761.70)?

      ____ Yes ____ No ____ NA

      If yes, specify the method: _____

   b. For liquid hazardous waste containing PCBs at concentrations greater than or equal to 500 ppm, is the waste incinerated or disposed of by other approved alternate methods (40 CFR 761. 60 (e))?

      ____ Yes ____ No ____ NA

      If yes, specify the method and state whether the facility has submitted a written request to the Regional Administrator or Assistant Administrator for an exemption from the incineration requirement:

B. Waste Analysis

1. F-Solvent wastes

a. Does the generator determine whether the F-solvent waste exceeds treatment standards?

____ Yes ✓ No ____ NA

How was this determination made?

- Knowledge of waste

____ Yes ____ No

If yes, note how this is adequate: _____

- TCLP

____ Yes ____ No

If yes, provide the date of last test, the frequency of testing, and note any problems. Attach test results.

b. Does the F-solvent waste exceed applicable treatability group treatment standards upon generation [268.7(a)(2)]?

✓ Yes ____ No ____ NA

If yes, specify the waste stream: F003/1005

c. Does the generator dilute the F-solvent waste as a substitute for adequate treatment [268.3]?

____ Yes ✓ No ____ NA

d. How does the generator test F-solvent waste when a process or waste stream changes?

steady waste stream

N/A 2. California List wastes

a. Does the generator determine whether the waste is a liquid according to the Paint Filter Liquids Test (PFLT method 9095) as described by SW-846?

____ Yes ____ No ____ NA

N/A b. If the waste is determined to be a liquid according to PFLT, is an absorbent added to the waste?

____ Yes ____ No ____ NA

What type of absorbent is used? _____
Check the types of waste that absorbent is added to.

___ Liquid hazardous waste having a pH less than or equal to 2

___ Liquid hazardous waste containing HOCs in concentrations greater than or equal to 1,000 mg/L, but less than 10,000 mg/L

___ Liquid hazardous waste containing metals

___ Liquid hazardous waste containing free cyanides

N/A c. Does the generator determine whether the concentration levels (not extract or filtrate) in the waste equal or exceed the prohibition levels or whether the waste has a pH of less than or equal to 2.0 based on:

- Knowledge of wastes

____ Yes ____ No ____ NA

If yes, note how this is adequate: _____
_____
_____

- Testing

____ Yes ____ No ____ NA

If yes, list test method used: _____

N/A d. Does the generator determine if concentration levels in PFLT extract exceed cyanide and metals treatment standards?

____ Yes ____ No ____ NA

- If yes, list test method used and constituent and concentration levels that exceeded prohibition levels: _____
_____
_____
_____

N/A e. Does the generator dilute the waste as a substitute for adequate treatment [268.3]?

____ Yes ____ No ____ NA

C. Management

1. On-site Management

Is waste that exceeds the treatment standards treated, stored or disposed on-site?

___ Yes ✓ No

If yes, the TSD Checklist must be completed.

2. Off-site Management

a. Does the generator ship any waste that exceeds the treatment standards to an off-site treatment facility?

✓ Yes ___ No

If yes, does the generator provide notification to the treatment facility [268.7(a)(1)]?

✓ Yes ___ No they have provided one copy for shipments

If yes, does notification contain the following?

- EPA Hazardous waste number(s) ___ Yes ___ No
- Applicable treatment standards ___ Yes ___ No
- Manifest number ___ Yes ___ No
- Waste analysis data, if available ___ Yes ___ No

facility has mis-characterized wastes as D001, rather than as F003/F005

Identify off-site treatment facilities: _____

b. Does the generator ship any waste that meets the treatment standards to an off-site disposal facility?

___ Yes ✓ No

If yes, does the generator provide notification and certification to the disposal facility [268.7(a)(2)]?

___ Yes ___ No

If yes, does notification contain the following?

EPA Hazardous waste number(s)	____ Yes	____ No
Applicable treatment standards	____ Yes	____ No
Manifest number	____ Yes	____ No
Waste analysis data, if available	____ Yes	____ No
Certification that the waste meets treatment standards	____ Yes	____ No

Identify off-site land disposal facilities: _____

N/A c. Does the generator ship any restricted waste to an off-site storage facility?

If yes, identify off-site storage facilities: _____

d. If the waste is subject to a nationwide variance (e.g., solvent-water mixtures less than 1%), extension (268.5), or petition (268.6), does the generator provide notification to the off-site disposal facility that the waste is exempt from land disposal restrictions [268.7(a)(3)]?

____ Yes ____ No ✓ NA

D. Treatment Using RCRA 264/265 Exempt Units or Processes
(i.e., boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.)

Are treatment residuals generated from exempt units or processes under RCRA 264/265?

✓ Yes ____ No

If yes, list types of waste treatment unit(s) and process(es):

dehilation units, air stripping type of syste
Sludge generated, settling bottoms

APPENDIX A

SOLVENT IDENTIFICATION CHECKLIST

1. Does the handler generate any of the following F001 constituents (i.e., spent halogenated solvents used in degreasing) as a result of being used in the process either in pure form or commercial grade?

tetrachloroethylene	___Yes	___No
trichloroethylene	___Yes	___No
methylene chloride	___Yes	___No
1,1,1-trichloroethane	___Yes	___No
carbon tetrachloride	___Yes	___No
chlorinated fluorocarbons	___Yes	___No

2. Does the handler generate any of the following F002 constituents (i.e., spent halogenated solvents) as a result of being used in the process either in pure form or commercial grade?

tetrachloroethylene	___Yes	___No
trichloroethylene	___Yes	___No
methylene chloride	___Yes	___No
1,1,1-trichloroethane	___Yes	___No
chlorobenzene	___Yes	___No
trichlorofluoromethane	___Yes	___No
1,1,2-trichloro-1,2,2-trifluoroethane	___Yes	___No
ortho-dichlorobenzene	___Yes	___No

3. Does the handler generate any of the following F003 constituents (i.e., spent nonhalogenated solvents) as a result of being used in the process either in pure form or commercial grade?

xylene	✓ Yes	___No
acetone	___Yes	___No
ethyl acetate	✓ Yes	___No
ethyl benzene	___Yes	___No
ethyl ether	___Yes	___No
methyl isobutyl ketone	___Yes	___No
n-butyl alcohol	___Yes	___No
cyclohexanone	___Yes	___No
methanol	___Yes	___No

If the F003 wastestream has been mixed with a solid waste, does the resultant mixture exhibit the ignitability characteristic? ___Yes ___No

N/A

4. Does the handler generate any of the following F004 constituents (i.e., spent nonhalogenated solvents) as a result of being used in the process either in pure form or commercial grade?

cresols and cresylic acid	___Yes	✓ No
nitrobenzene	___Yes	✓ No

5. Does the handler generate any of the following F005 constituents (i.e., spent nonhalogenated solvents) as a result of being used in the process either in pure form or commercial grade?

toluene	✓ Yes	___No
methyl ethyl ketone	___Yes	✓ No
carbon disulfide	___Yes	✓ No
isobutanol	___Yes	✓ No
pyridine	___Yes	✓ No

6. Are any of the constituents listed in questions 1 through 5 used for their "solvent" properties -- that is to solubilize (dissolve) or mobilize other constituents? The following questions will be helpful in confirming this determination.

(a) Are the constituents used as chemical carriers?
___Yes ✓ No

If yes, list the constituents.

_____

_____

(b) Are the constituents used for degreasing/cleaning?
✓ Yes ___No

If yes, list the constituents.

_____

_____

(c) Are the constituents used as diluents?
✓ Yes ___No

If yes, list the constituents.

_____

_____

(d) Are the constituents used as extractants?
___Yes ✓ No

If yes, list the constituents.

_____

_____

(e) Are the constituents used for fabric scouring?
___Yes ___/___No

If yes, list the constituents.

_____

_____

(f) Are the constituents used as reaction and synthesis media?
___Yes ___/___No

If yes, list the constituents.

_____

_____

If the responses to questions 1 through 6 led the Inspector to believe that the waste may be an F-solvent, answer question 7.

7. Are any of the above constituents spent solvents? (A solvent is considered "spent" when it has been used and is no longer used without being regenerated, reclaimed, or otherwise reprocessed.) ___/___Yes ___No

8. If the waste is a mixture of constituents as determined in questions 1 through 6, answer the following question to determine whether it is a "solvent mixture" covered by the listings.

   If the waste stream is mixed and contains more than one of the F001-F005 constituents listed in questions 1 through 5 (by volume), give the concentration before use of <u>all</u> the constituents in the solvent mixture/blend. For example:

5%	methylene chloride
2%	trichloroethylene
25%	1,1,1-trichloroethane
<u>68%</u>	mineral spirits
100%	

   If the waste stream is a mixture containing a total of 10% or more (by volume) of one or more of the F001, F002, F004, or F005 listed constituents before use, it is a listed waste.

   With respect to the F003 solvent wastes, if, before use, the waste stream is mixed and contains <u>only</u> F003 constituents, it is a listed waste. For example:

APPENDIX B
TREATMENT STANDARDS FOR F-SOLVENTS

F001-F005 SPENT SOLVENTS	CONCENTRATION (IN MG/L) WASTEWATERS	OTHER WASTES
Acetone	0.05	0.59
N-butyl	5.0	5.0
Carbon disulfide	1.05	4.81
Carbon tetrachloride	.05	.96
Chlorobenzene	.15	.05
Cresols (and cresylic acid)	2.82	.75
Cycohexanone	.125	.125
1,2-dichlorobenzene	.65	.75
Ethyl acetate	.05	.053
Ethyl benzene	.05	.75
Ethyl ether	5.0	5.0
Isobutanol	.25	.75
Methanol	###	###
Methylene chloride (from the pharmaceutical industry)	12.7	.96
Methyl ethyl ketone	0.05	0.75
Methyl isobutyl ketone	0.05	.33
Nitrobenzene	0.66	0.125
Pyridine	1.12	0.33
Tetrachloroethylene	0.079	0.05
Toluene	1.12	0.33
1,1,1-Trichloroethane	1.05	0.41
1,2,2-Trichlor 1,2,2-trifluoroethane	1.05	0.96
Trichloroethylene	0.062	0.091
Trichlorofluoromethane	0.05	0.96
Xylene	0.05	0.15

Revised 10-15-87

RCRA Inspection Report

EPA Identification Number OHD 058 394 313

HWFAB Permit Number (if appropriate) - -

Facility Name Colorpac, Inc.

Location 208 S. Avenue

Franklin, Ohio 45005

Person(s) Interviewed	Title	Telephone
MR. Edward Miller	Plant Manager	513-

Inspector(s)	Agency/Title	Telephone
Dave Duell	Ohio EPA HWS	513-461-4870
	Ohio EPA	
	Ohio EPA	

Installation Activity

Mark One

- [x] Generator only (G)
- [ ] Transporter only (T)
- [ ] TSDF only
- [ ] G-T
- [ ] G-TSDF
- [ ] T-TSDF
- [ ] G-T-TSDF

If the site is a TSDF, check the boxes indicating which forms were used -

- [x] General Facility Standards, Preparedness and Prevention, Contingency and Emergency, Manifests/Records/Reporting
- [ ] Groundwater Monitoring
- [ ] Closure and Post-Closure
- [ ] Financial Requirements
- [x] Containers S01
- [ ] Tanks S02/T01
- [ ] Surface Impoundments S04/T02
- [ ] Incineration/Thermal Treatment T03
- [ ] Chemical/Physical/Biological T04
- [ ] Waste Piles S03
- [ ] Land Treatment D81
- [ ] Landfills D80

Re: Warren County
Hazardous Materials
Colorpac, Inc.

Mr. Edward F. Miller
Colorpac, Inc.
708 South Avenue
Franklin, Ohio 45005

June 22, 1982

Dear Mr. Miller:

As per our conversation of 22 June 1982, your facility wishes to establish itself as a generator and not a treatment/storage/disposal facility. In order to maintain this status, certain requirements must be met by your facility. I have enclosed a copy of the inspection form used to inspect generators. Please review it and set up the necessary records to comply with the Ohio Hazardous Waste Rules and Federal Regulations. You will be contacted in approximately 30 days to schedule an inspection.

If you have any questions, please feel free to contact me.

Sincerely,

David P. Duell
Hazardous Materials Management

DPD/dkp

cc: Paul Cotter, OEPA
cc: Kathy Homer, USEPA
cc: Bob Fragale, HWFAB

State of Ohio Environmental Protection Agency
Southwest District Office
7 East Fourth Street, Dayton, Ohio 45402-2086 (513) 461-4670

James A. Rhodes, Governor
Wayne S. Nichols, Director

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

HRE-8J

July 2, 1993

Mr. Ron Kline
Graphic Packaging of Ohio
708 South Avenue
Franklin, OH 45005

Re: Visual Site Inspection
Graphic Packaging Corporation
Franklin, Ohio
ID No. ~~ILD~~ 058 394 313
OHD

Dear Mr. Kline:

As per your request, the U.S. Environmental Protection Agency is enclosing a copy of the final Preliminary Assessment/Visual Site Inspection (PA/VSI) report for the referenced facility. The executive summary and conclusions and recommendations sections have been withheld as Enforcement Confidential.

If you have any questions, please call Francene Harris at 312/886-2884.

Sincerely yours,

Francene D. Harris for.
Kevin M. Pierard, Chief
Minnesota/Ohio Technical Enforcement Section
RCRA Enforcement Branch

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

HRE-8J

April 21, 1993

Mr. Ron Kline
Graphic Packaging Corporation
708 South Avenue
Franklin, Ohio 45005

Re: Visual Site Inspection
Graphic Packaging Corporation
(Formerly Colorpac, Inc.)
Franklin, Ohio
OHD 058 394 313

Dear Mr. Kline:

The U.S. Environmental Protection Agency is enclosing a copy of the final Preliminary Assessment/Visual Site Inspection (PA/VSI) report for the referenced facility. The executive summary and conclusions and recommendations sections have been withheld as Enforcement Confidential.

If you have any questions, please call Francene Harris at (312) 886-2884.

Sincerely yours,

Kevin M. Pierard, Chief
Minnesota/Ohio Technical Enforcement Section
RCRA Enforcement Branch

PRC Environmental Management, Inc.
233 North Michigan Avenue
Suite 1621
Chicago, IL 60601
312-856-8700
Fax 312-938-0118

PRELIMINARY ASSESSMENT/ VISUAL SITE INSPECTION

GRAPHIC PACKAGING CORPORATION (FORMERLY COLORPAC, INC.) FRANKLIN, OHIO OHD 058 394 313

FINAL REPORT

Prepared for

U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Waste Programs Enforcement
Washington, DC 20460

Work Assignment No.	:	C05087
EPA Region	:	5
Site No.	:	OHD 058 394 313
Date Prepared	:	March 11, 1993
Contract No.	:	68-W9-0006
PRC No.	:	009-C05087OH4U
Prepared by	:	PRC Environmental Management, Inc. (Kate Reising)
Contractor Project Manager	:	Shin Ahn
Telephone No.	:	(312) 856-8700
EPA Work Assignment Manager	:	Kevin Pierard
Telephone No.	:	(312) 886-4448

TABLE OF CONTENTS

LIST OF TABLES

LIST OF FIGURES

EXECUTIVE SUMMARY

PRC Environmental Management, Inc. (PRC), performed a preliminary assessment and visual site inspection (PA/VSI) to identify and assess the existence and likelihood of releases from solid waste management units (SWMU) and other areas of concern (AOC) at the Graphic Packaging Corporation (GPC) facility in Franklin, Warren County, Ohio. This summary highlights the results of the PA/VSI and the potential for releases of hazardous wastes or hazardous constituents from SWMUs and AOCs identified. In addition, a completed U.S. Environmental Protection Agency (EPA) Preliminary Assessment Form (EPA Form 2070-12) is included in Attachment A to assist in prioritizing RCRA facilities for corrective action.

The GPC facility manufactures bags, pouches, and overwrap for products including moist pet foods, cookies, microwave popcorn, bar and soap dishes, and tobacco. The facility operates as a generator of hazardous waste with less than 90-day storage. GPC generates off-specification prinking ink (D001, F003, F005) from ink that has gelled in storage, waste solvent (D001, F003, F005) from printing press roller cleaning, solvent still bottoms (D001, F003, F005) and still bottom ink sludge (D001, F003, F005) from solvent recovery, nonhazardous wastewater, and nonhazardous waste cleaning solution from the cleaning of printing press bearings and other machine parts.

The 90,000-square-foot facility is located on 20 acres of land in a mixed industrial, rural, and residential area of Franklin, Ohio. The facility was built in 1962 by the Flexographic Corporation (Flexographic). Flexographic changed the company name to Colorpac, Inc. (Colorpac) in 1965. Although ownership of the facility changed several times between 1969 and 1972, the facility's name remained unchanged. The facility was owned by Monarch Marking from 1969 to 1970, Monarch Marking and Pitney Bowes from 1970 to 1972, and American Controlled Industries from 1972 to 1985.

The Graphic Packaging Corporation (GPC) purchased the facility in 1985, and the facility name changed to reflect the new ownership. GPC owned the facility jointly with the Adolph Coors Company from 1988 until 1992 when the facility was purchased by ACX Technologies, Inc. Operations at the facility have remained basically the same since 1962.

Colorpac's Part A permit application listed the facility as a treatment, storage, or disposal (TSD) facility with storage of hazardous waste in the Hazardous Waste Storage Area (SWMU 4). However, Colorpac was also using the Former Waste Solvent Tank (SWMU 5) to store waste, but possibly for less than 90 days. In 1982, Colorpac requested a change in status from a TSD facility to that of a generator with less than 90-day storage. Colorpac was subject to closure

requirements because hazardous waste had previously been stored at the facility for longer than 90 days in SWMU 4.

Colorpac submitted a Request for Change in Status form to EPA in January 1985, which stated that all waste stored at the facility for greater than 90 days had been permanently removed. In March 1985, EPA acknowledged Colorpac's change in status to a RCRA generator of hazardous waste with less than 90-day storage.

The PA/VSI identified the following five SWMUs at the facility. No AOCs were identified.

Solid Waste Management Units

1. Outdoor Solvent Recovery System
2. Indoor Solvent Recovery System
3. Waste Solvent Storage Tank
4. Hazardous Waste Storage Area
5. Former Waste Solvent Tank

The potential for release to ground water, surface water, air, and on-site soils from all SWMUs is low. SWMU 1 is constructed of steel and is located on sealed concrete. SWMU 2 is located indoors on sealed concrete. SWMUs 3 and 4 are located on sealed concrete and are surrounded by concrete berms.

Area ground water is used as a local drinking water source. The City of Franklin draws drinking water from four wells located about 0.4 miles south and downgradient of the GPC facility near the Great Miami River.

A small, man-made cooling pond on the facility property receives noncontact cooling water from the facility. The Great Miami River is located about 0.5 miles south of the facility. The river flows south and eventually enters the Ohio River near Cincinnati. The Great Miami River is used for recreational fishing and boating. GPC does not possess a National Pollution Discharge Elimination System permit because the facility does not discharge to any surface water body. The facility is surrounded by a chain-link fence and is equipped with a fire alarm system.

The GPC facility possess 32 air permits covering the solvent recovery system and ink mixing processes.

The facility has a permit to discharge wastewater to the City of Franklin sewer system. The wastewater is generated from the solvent recovery process and contains trace amounts of alcohol. GPC is required to test the wastewater for metals and pH before discharging.

PRC recommends no further action for the facility.

1.0 INTRODUCTION

PRC Environmental Management, Inc. (PRC), received Work Assignment No. C05087 from the U.S. Environmental Protection Agency (EPA) under Contract No. 68-W9-0006 (TES 9) to conduct preliminary assessments (PA) and visual site inspections (VSI) of hazardous waste treatment and storage facilities in Region 5.

As part of the EPA Region 5 Environmental Priorities Initiative, the RCRA and CERCLA programs are working together to identify and address RCRA facilities that have a high priority for corrective action using applicable RCRA and CERCLA authorities. The PA/VSI is the first step in the process of prioritizing facilities for corrective action. Through the PA/VSI process, enough information is obtained to characterize a facility's actual or potential releases to the environment from solid waste management units (SWMU) and areas of concern (AOC).

A SWMU is defined as any discernible unit at a RCRA facility in which solid wastes have been placed and from which hazardous constituents might migrate, regardless of whether the unit was intended to manage solid or hazardous waste.

The SWMU definition includes the following:

- RCRA-regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells
- Closed and abandoned units
- Recycling units, wastewater treatment units, and other units that EPA has usually exempted from standards applicable to hazardous waste management units
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents. Such areas might include a wood preservative drippage area, a loading or unloading area, or an area where solvent used to wash large parts has continually dripped onto soils.

An AOC is defined as any area where a release of hazardous waste or constituents to the environment has occurred or is suspected to have occurred on a nonroutine and nonsystematic basis. This includes any area where a strong possibility exists that such a release might occur in the future.

The purpose of the PA is as follows:

- Identify SWMUs and AOCs at the facility
- Obtain information on the operational history of the facility
- Obtain information on releases from any units at the facility
- Identify data gaps and other informational needs to be filled during the VSI

The PA generally includes review of all relevant documents and files located at state offices and at the EPA Region 5 office in Chicago.

The purpose of the VSI is as follows:

- Identify SWMUs and AOCs not discovered during the PA
- Identify releases not discovered during the PA
- Provide a specific description of the environmental setting
- Provide information on release pathways and the potential for releases to each medium
- Confirm information obtained during the PA regarding operations, SWMUs, AOCs, and releases

The VSI includes interviewing appropriate facility staff; inspecting the entire facility to identify all SWMUs and AOCs; photographing all visible SWMUs; identifying evidence of releases; making a preliminary selection of potential sampling parameters and locations, if needed; and obtaining additional information necessary to complete the PA/VSI report.

This report documents the results of a PA/VSI of the Graphic Packaging Corporation (GPC) facility (EPA Identification No. OHD 058 394 313) in Franklin, Warren County, Ohio. The PA was completed on December 8, 1992. PRC gathered and reviewed information from the Ohio Environmental Protection Agency (OEPA) and from EPA Region 5 RCRA files. The VSI was conducted on December 10, 1992. It included interviews with facility representatives and a walk-through inspection of the facility. PRC identified four SWMUs and no AOCs at the facility.

PRC completed EPA Form 2070-12 using information gathered during the PA/VSI. This form is included as Attachment A. The VSI is summarized and five inspection photographs are included in Attachment B. Field notes from the VSI are included in Attachment C.

2.0 FACILITY DESCRIPTION

This section describes the facility's location; past and present operations; waste generating processes and waste management practices; a history of documented releases; regulatory history, environmental setting; and receptors.

2.1 FACILITY LOCATION

The GPC facility is located on South Avenue in Franklin, Ohio (latitude 39°33'50"N, longitude 84°18'55"W), as shown in Figure 1. The facility is bordered to the north by residences, to the east by Union Camp Corporation, and to the south and west by farmland.

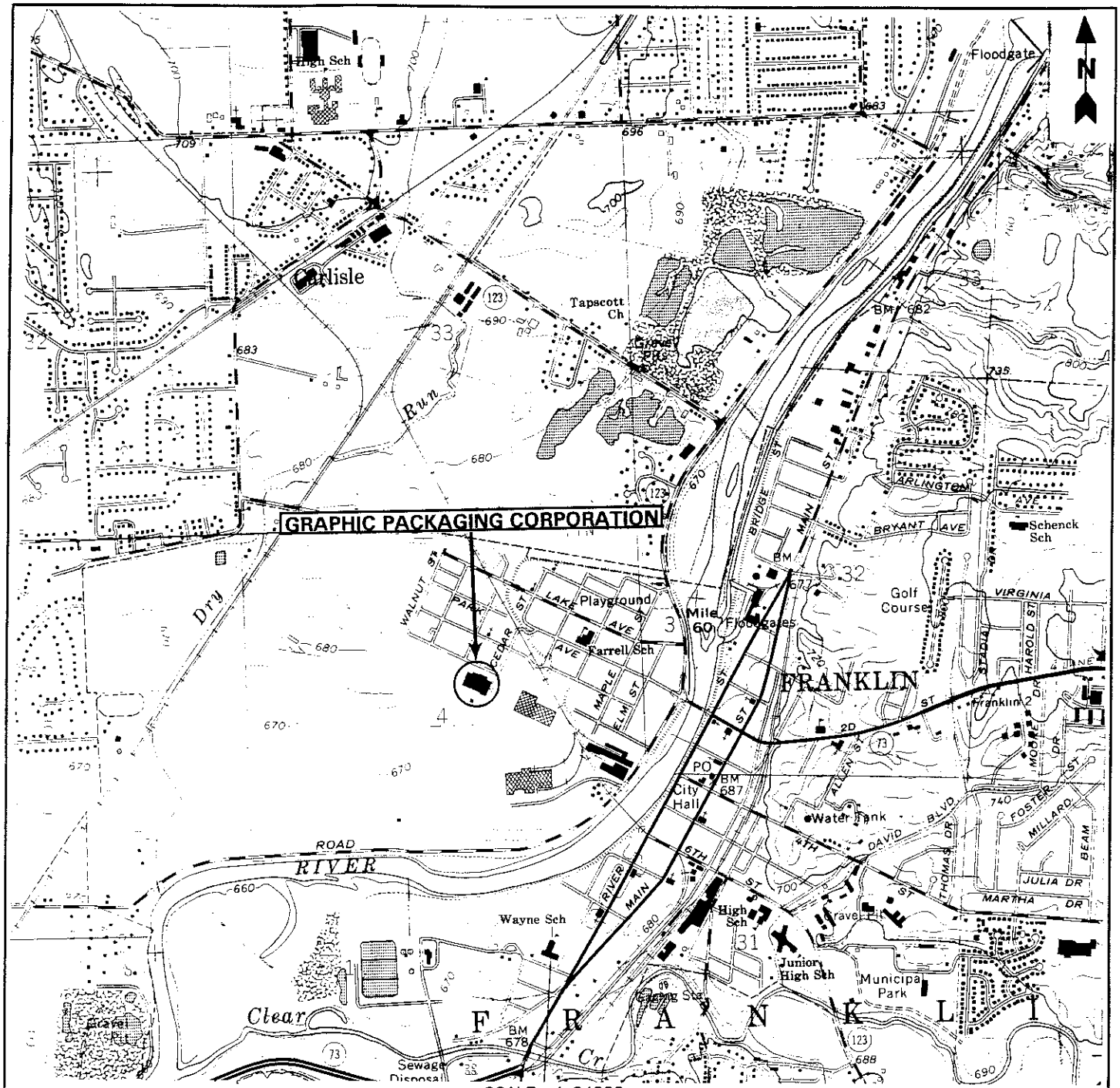
2.2 FACILITY OPERATIONS

The GPC facility building covers 90,000 square feet on 20 acres of land in a mixed industrial, rural, and residential area. The facility was built in 1962 by Flexographic Corporation. In 1965, the facility's name changed to Colorpac, Inc. (Colorpac). Between 1969 and 1972, ownership of the facility changed three times while the name remained unchanged. Monarch Marking purchased the facility from Colorpac in 1969. The facility was later owned by Monarch Marking and Pitney Bowes. American Controlled Industries purchased the facility in 1972.

The Graphic Packaging Corporation (GPC) purchased the facility in 1985, and the facility name changed to reflect the new ownership. GPC owned the facility jointly with the Adolph Coors Company from 1988 until 1992 when the facility was purchased by ACX Technologies, Inc.

GPC manufactures flexible packaging materials and products for manufacturers in the pet food, consumer food, personal care products, and photographic industries. The facility manufactures bags, pouches, and overwrap for products including semi-moist pet foods, microwave popcorn, cookies, bar and dish soaps, and tobacco. Operations at the facility have remained basically the same since 1962.

Raw materials used at the GPC facility are stored in two warehouses located in the northwest section of the facility. Finished products are stored in the manufacturing building. All hazardous waste generated at the facility is stored in the Hazardous Waste Storage Area (SWMU 4) for less than 90 days.



SOURCE: Modified from USGS, 1981.

GRAPHIC PACKAGING CORPORATION
FRANKLIN, OHIO

FIGURE 1
FACILITY LOCATION

PRC ENVIRONMENTAL MANAGEMENT, INC.

2.3 WASTE GENERATION AND MANAGEMENT

The GPC facility generates off-specification printing ink (D001, F003, and F005), solvent still bottoms (D001, F003, and F005), waste solvents (D001, F003, and F005), still bottom ink sludge (D001, F003, and F005), nonhazardous wastewater, and nonhazardous waste cleaning solution. The facility formerly managed waste solvent (D001, F003, and F005) differently. The facility's SWMUs are identified in Table 1. The facility layout, including SWMUs and AOCs, is shown in Figure 2. The facility's waste streams are summarized in Table 2.

Off-specification printing ink (D001, F003, and F005) results from ink that has gelled and is no longer usable. Once ink becomes off-specification, it is transferred from the raw materials warehouses to the Hazardous Waste Storage Area (SWMU 4). GPC generates about 1,832 pounds of off-specification printing ink yearly. The ink is sent to Reclaimed Energy Corporation (Reclaimed Energy) in Connersville, Indiana for fuels blending.

GPC generates solvent still bottoms (D001, F003, and F005) from the Outdoor Solvent Recovery System (SWMU 1). The Outdoor Solvent Recovery System collects solvent laden air from printing presses and laminators, runs the air through charcoal beds which absorb the solvent, and then flushes the solvent out with steam. The dirty solvent is then transferred to a still for reclamation. The still removes waste particles from the dirty solvent, producing solvent still bottoms. The solvent still bottoms are stored in SWMU 4 until shipment to Reclaimed Energy for fuels blending. The recovered solvent is pumped to aboveground storage tanks for reuse. GPC generates about 458 pounds of solvent still bottoms yearly.

Waste solvents (D001, F003, and F005) are generated from the cleaning of printing press rollers. The materials are reclaimed on site at the Indoor Solvent Recovery System (SWMU 2). After cleaning rollers, waste solvent is pumped to the Waste Solvent Storage Tank (SWMU 3). The waste solvent is then transferred to SWMU 2 where it is recovered by distillation. The distillation process generates still bottom ink sludge (D001, F003, and F005). The sludge is stored in 55-gallon drums in SWMU 4 until it is sent for fuels blending at Reclaimed Energy. GPC generates about 192,632 pounds of still bottom ink sludge yearly.

Prior to the installation of the solvent recovery systems, waste solvent (D001, F003, and F005), generated from cleaning operations, was stored in the Former Waste Solvent Tank (SWMU 5) for possibly less than 90 days. The waste solvent was pumped from the tank to a bulk tanker truck and taken to Solvent Resource and Recovery Company in West Carrolton, Ohio for reclamation. In the early 1980s, GPC removed the waste solvent from the tank and had it cleaned. The tank is currently used to store virgin ethyl acetate.

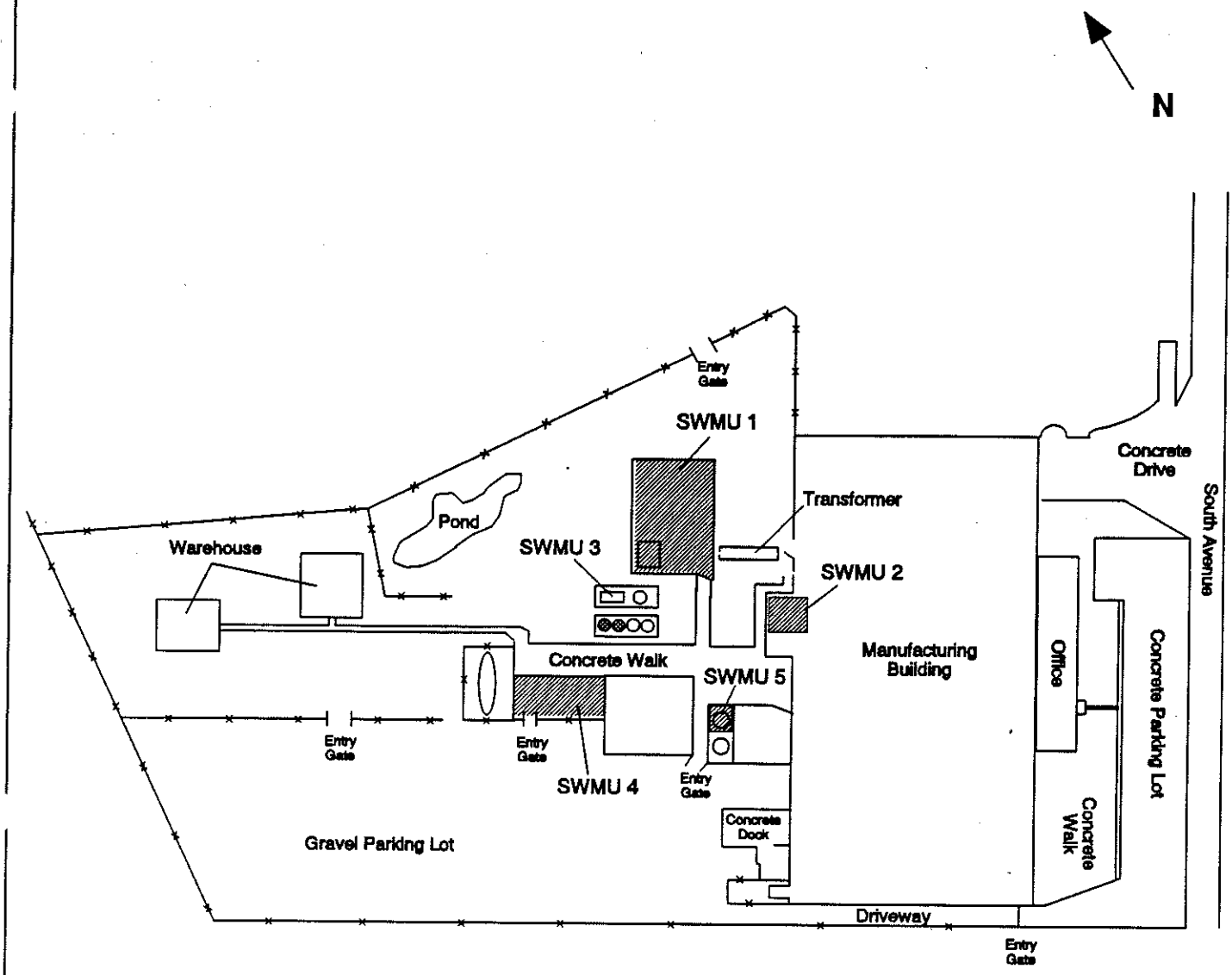
TABLE 1

SOLID WASTE MANAGEMENT UNITS

SWMU Number	SWMU Name	RCRA Hazardous Waste Management Unit[a]	Status
1	Outdoor Solvent Recovery System	No	Active
2	Indoor Solvent Recovery System	No	Active
3	Waste Solvent Storage Tank	No	Active
4	Hazardous Waste Storage Area	Yes	Active; RCRA closed in 1985; currently used to store hazardous waste for less than 90 days
5	Former Waste Solvent Tank	No	Inactive as a SWMU; currently used to store virgin ethyl acetate

Note:

[a] A RCRA hazardous waste management unit is one that currently requires or formerly required submittal of a RCRA Part A or Part B permit application.



Solid Waste Management Units

SWMU 1	Outdoor Solvent Recovery System
SWMU 2	Indoor Solvent Recovery System
SWMU 3	Waste Solvent Storage Tank
SWMU 4	Hazardous Waste Storage Tank
SWMU 5	Former Waste Solvent Tank

LEGEND:

Fence

Recovered Solvent Holding Tanks

0 35' 70'

SCALE: 1" = 70'

GRAPHIC PACKAGING CORPORATION
FRANKLIN, OHIO

FIGURE 2

FACILITY LAYOUT

Source: Modified from Graphic Packaging sketch received by PRC on 12/10/92.

PRC ENVIRONMENTAL MANAGEMENT, INC.

TABLE 2

SOLID WASTES

Waste/EPA Waste Code[a]	Source	Solid Waste Management Unit[b]
Off-specification printing ink/D001, F003, F005	Gelled ink	4
Solvent still bottoms/D001, F003, F005	Solvent recovery	1 and 4
Waste solvents/D001, F003, F005	Cleaning of printing press rollers	2, 3, and 5
Still bottom ink sludge/D001, F003, F005	Solvent recovery	2 and 4
Wastewater/NA	Solvent recovery	None
Waste cleaning solution/NA	Parts cleaning	4

Notes:

[a] Not applicable (NA) designates nonhazardous waste.

[b] "None" indicates that the waste stream is not managed on site.

GPC generates about 10,000 gallons per day of wastewater containing trace amounts of alcohol from the solvent recovery process. GPC tests the water for metals and pH before discharging it to the City of Franklin sewer system.

GPC uses a nonflammable, nontoxic, biodegradable solution to clean press bearings and other machine parts. The cleaning solution is reused until it is spent and is then mixed with still bottoms and stored in 55-gallon drums in SWMU 4. The mixture of waste cleaning solution and still bottoms is shipped to Reclaimed Energy for fuels blending.

2.4 HISTORY OF DOCUMENTED RELEASES

No releases from the GPC facility have been documented.

2.5 REGULATORY HISTORY

In late 1980, Colorpac filed a Notification of Hazardous Waste Activity form with EPA (Colorpac, 1980a). A Part A permit application in October 1980 identified Colorpac as a treatment, storage, or disposal (TSD) facility with container storage (S01) of hazardous waste. The application listed ignitable waste (D001) and spent halogenated solvents (F003 and F005). The Hazardous Waste Storage Area (SWMU 4), with a capacity of 15,600 gallons, was listed as the storage unit for these wastes (Colorpac, 1980b). EPA determined the original Part A permit application was lacking a facility map and an overhead photo (USEPA, 1981). Colorpac supplied the missing information, and EPA subsequently granted the facility interim status (USEPA, 1982). It should be noted that GPC was using the Former Waste Solvent Tank (SWMU 5) for waste storage possibly for less than 90 days when the Part A permit application was submitted. The tank was not listed on the application.

In 1982, Colorpac requested a change in status from a TSD facility to that of a generator of hazardous waste with less than 90-day storage (OEPA, 1982). EPA informed Colorpac that because the facility had previously stored hazardous waste for longer than 90 days, Colorpac was subject to closure requirements (USEPA, 1984). Colorpac submitted a Request for Change in Status form to EPA in January 1985, which stated that all waste stored at the facility for greater than 90 days had been permanently removed (Colorpac, 1985). In March 1985, EPA acknowledged Colorpac's change in status to a RCRA generator of hazardous waste with less than 90-day storage (USEPA, 1985). PRC found no documentation indicating that a closure plan was submitted for the change in status.

In 1985, GPC purchased the facility from Colorpac (GPC, 1992). GPC operates as a RCRA generator of hazardous waste with less than 90-day storage.

EPA conducted two hazardous waste generator compliance evaluation inspections at the GPC facility in 1988 and 1989. The first inspection was conducted on August 16, 1988. EPA noted a few minor deficiencies, including improper characterization of hazardous waste on manifests and incomplete employee records (OEPA, 1988). GPC corrected all deficiencies (GPC, 1988).

The second inspection was performed on May 10, 1989. EPA noted deficiencies in GPC's manifests, management of containers, and personnel training records (OEPA, 1989a). GPC corrected all deficiencies (OEPA, 1989b).

GPC possesses 32 air permits covering the solvent recovery systems and ink mixing processes. The facility has no history of odor complaints from area residents.

GPC discharges wastewater generated from the solvent recovery system to the City of Franklin sewer system. The wastewater contains trace amounts of alcohol. The City of Franklin requires the facility to test the wastewater for metals and pH before discharging. GPC is not required to possess a National Pollutant Discharge Elimination System (NPDES) permit because it does not discharge wastewater to any surface water bodies.

No record exists of underground storage tanks (UST) at the facility. No CERCLA activity has been conducted at the facility.

2.6 ENVIRONMENTAL SETTING

This section describes the climate; flood plain and surface water; geology and soils; and ground water in the vicinity of the facility.

2.6.1 Climate

The climate in Franklin consists of cold, cloudy winters and warm summers. The yearly average temperature is 63.4 degrees Fahrenheit (°F). The lowest average monthly temperature is 37.4°F in January. The highest average monthly temperature is 86.1°F in July. Precipitation for southwest Ohio is well distributed throughout the year. Average yearly rainfall for Warren County is 36.45 inches. Rainfall peaks in July at 4.23 inches and is at its least in October at 1.97 inches (USDA, 1973). The 1-year, 24-hour maximum rainfall is 2.5 inches (USDC, 1961), and

the average yearly net precipitation is 6.0 inches (Todd, 1983). The prevailing wind is from the southwest, and the highest average wind speed is 11 miles per hour in the winter (USDA, 1973).

2.6.2 Flood Plain and Surface Water

A small, man-made cooling pond is located on GPC's property. GPC discharges noncontact cooling water to the pond, which discharges to the local ground water.

The Great Miami River is located about 0.5 mile south of the facility. The river flows south and eventually empties into the Ohio River near Cincinnati. The Great Miami River is used for recreational fishing and boating. No municipal water intakes are located on the Great Miami River downstream from the facility (PRC, 1991).

The GPC facility is located within the 100-year flood plain of the Great Miami River (National Flood Insurance Program, 1987).

2.6.3 Geology and Soils

Warren County lies almost on the crest of the Cincinnati Arch, a large regional anticline running from Tennessee to west-central Ohio. The bedrock in the area of the facility is Ordovician-age shale and limestone of the Cincinnati series and lies at least 150 feet below ground surface. Pleistocene glacial deposits overlie the bedrock and are composed of till, sand, clay, silt, and gravel (Ausich, 1981).

Glacial depositional environments are usually quite unconsolidated, and this is the case in the GPC facility area. The nearest available well log was of a well located about 0.4 mile southwest of the GPC facility. The log listed the following materials in descending order (ODNR, 1992):

- 0 to 12 feet: Clay
- 12 to 28 feet: Gravel
- 28 to 88 feet: Sand and gravel

Soils near the facility belong to the Genessee-Fox association. Typically these soils are well drained and nearly level; they are usually located on flood plains and outwash terraces (USDA, 1973).

2.6.4 Ground Water

Depth to ground water in the area is about 22 feet below ground surface and wells in the area are capable of pumping over 1,000 gallons per minute (Todd, 1983). Ground water in the area is used as a local drinking water source. The City of Franklin supplies area residents with drinking water from four wells located about 0.4 mile to the south and downgradient of the facility near the Great Miami River. The wells are screened at an average depth of about 65 feet. Ground water flow is generally to the south (PRC, 1993).

2.7 RECEPTORS

The GPC facility is located in a mixed industrial, rural, and residential area of Franklin, Ohio. Several residences are located directly across the street from the facility. Farrell Elementary School is located about 0.3 mile northeast of the facility. About 790 private residences lie within 1 mile of GPC. The facility is bordered to the north by residences, to the east by Union Camp Corporation, and to the south and west by farmland. The facility is surrounded by a chain-link fence and is equipped with a fire alarm system.

As mentioned in Section 2.6.2, a small, man-made cooling pond is located on GPC's property. GPC discharges noncontact cooling water to the pond.

The Great Miami River is located about 0.5 mile south of the facility. The river flows south and eventually enters the Ohio River. The Great Miami River is used for recreational fishing and boating. No drinking water intakes are located along the river downstream from the facility.

Area ground water is used for drinking water. The City of Franklin supplies area residents with drinking water from four wells located about 0.4 mile south and downgradient of the facility.

The Great Miami River is a sensitive environment mainly because of its aquatic life. No wetlands exist within 2 miles of the facility.

3.0 SOLID WASTE MANAGEMENT UNITS

This section describes the five SWMUs identified during the PA/VSI. The following information is presented for each SWMU: description of the unit, dates of operation, wastes managed, release controls, history of documented releases, and PRC's observations. Figure 2 shows the SWMU locations.

SWMU 1 **Outdoor Solvent Recovery System**

Unit Description: The Outdoor Solvent Recovery System consists of several tanks containing charcoal beds (see Photograph No. 1), lines which run throughout the facility from printing presses and laminators directly to charcoal bed tanks, and three aboveground storage tanks for storage of the recovered solvent. The charcoal bed tanks and the aboveground storage tanks are located outdoors in the west-central portion of the facility on a sealed concrete pad. The charcoal bed tanks are constructed of steel and measure about 16 feet in diameter and about 40 feet in length. The aboveground storage tanks are made of steel and each has a capacity of 5,000 gallons. GPC checks the structural integrity of the unit daily.

The system collects solvent-laden air from the printing presses and laminators and vents it through the tanks containing the charcoal beds which absorb the solvent. When the beds become saturated, the solvent is flushed out with steam and passed through a condenser. The solvent is then pumped to a still, where it is reclaimed. The clean solvent is then pumped to the aboveground storage tanks where it is stored until it is used again. The solvent still bottoms (D001, F003, F005) generated from the recovery process are collected in 55-gallon drums and stored in the Hazardous Waste Storage Area (SWMU 4).

Date of Startup: The unit was installed in 1982.

Date of Closure: The unit is active.

Wastes Managed:	The unit reclaims dirty solvent from printing presses and laminators. This process generates solvent still bottoms (D001, F003, F005).
Release Controls:	The unit is constructed of steel and rests on a sealed concrete base.
History of Documented Releases:	No releases from this unit have been documented.
Observations:	During the VSI, the unit appeared to be in sound condition. PRC noted no evidence of release in the area or cracks in the concrete base.
SWMU 2	**Indoor Solvent Recovery System**
Unit Description:	The Indoor Solvent Recovery System consists of a parts washer and a still. The unit is located indoors in the western portion of the manufacturing building (see Photograph No. 2). Printing press rollers are cleaned in the parts washer with solvent. Once the cleaning process is complete, the dirty solvent is collected from the parts washer and pumped to the Waste Solvent Storage Tank (SWMU 3). It is then transferred to the still for reclamation. The still bottom ink sludge (D001, F003, F005) generated from this process is collected in 55-gallon drums and transferred to the Hazardous Waste Storage Area (SWMU 4).
Date of Startup:	The unit was installed in 1982.
Date of Closure:	The unit is active.
Wastes Managed:	The unit reclaims dirty solvent from the parts washer. This process generates still bottom ink sludge (D001, F003, F005).
Release Controls:	The unit is constructed of steel and is located indoors on sealed concrete.
History of Documented Releases:	No releases from this unit have been documented.

Observations:	During the VSI, the unit appeared to be in sound condition. PRC noted no evidence of release in the area.
SWMU 3	**Waste Solvent Storage Tank**
Unit Description:	The Waste Solvent Storage Tank is located outdoors and aboveground in the central portion of the facility. The unit stores waste solvent (D001, F003, F005) generated from cleaning processes until it is reclaimed by SWMU 2. The tank is constructed of steel, has a sealed concrete base, and is surrounded by a 2-foot-high concrete berm (see Photograph No. 3).
Date of Startup:	The unit has been active since 1982.
Date of Closure:	The unit is active.
Wastes Managed:	The unit stores waste solvent (D001, F003, F005) until it is reclaimed by SWMU 2.
Release Controls:	The unit is constructed of steel, has a sealed concrete base, and is surrounded by a 2-foot-high concrete berm.
History of Documented Releases:	No releases from this unit have been documented.
Observations:	During the VSI, the unit appeared to be in sound condition. PRC noted no evidence of release.
SWMU 4	**Hazardous Waste Storage Area**
Unit Description:	The Hazardous Waste Storage Area is located outdoors in the west-central section of the facility. The unit stores hazardous waste and nonhazardous waste in closed 55-gallon drums on a concrete pad measuring 30 feet by 50 feet. The unit is surrounded by a 1-foot-high concrete berm and is uncovered (see Photograph No. 4).
Date of Startup:	The unit has been active since 1980.

Date of Closure:	The unit was considered RCRA-closed in 1985 when EPA acknowledged its change in status. No closure plan was found in EPA files. The unit currently stores hazardous waste for less than 90 days.
Wastes Managed:	The unit stores off-specification ink (D001, F003, F005), solvent still bottoms (D001, F003, F005), still bottom ink sludge (D001, F003, F005), and nonhazardous cleaning solution. All wastes are sent to Reclaimed Energy for fuels blending.
Release Controls:	The unit is located on sealed concrete and is surrounded by a 1-foot-high concrete berm.
History of Documented Releases:	No releases from this unit have been documented.
Observations:	During the VSI, the unit appeared to be in sound condition. PRC noted no evidence of release.
SWMU 5	**Former Waste Solvent Tank**
Unit Description:	Prior to the early 1980s, the Former Waste Solvent Tank stored waste solvent (D001, F003, F005) from cleaning operations possibly for less than 90 days. The tank now stores virgin ethyl acetate. The 5,000-gallon unit is located outdoors in the west-central section of the facility. It is uncovered and is surrounded by a 3-foot-high concrete berm (see Photograph No. 5).
Date of Startup:	The unit was first used in the mid-1970s.
Date of Closure:	In the early 1980s, all waste solvent was removed from the tank, and the tank was cleaned. The tank now stores virgin ethyl acetate.
Wastes Managed:	The unit stored waste solvent (D001, F003, F005) until it was removed from the facility for disposal.

Release Controls:	The unit is located on a concrete base and is surrounded by a 3-foot-high berm.
History of Documented Releases:	No releases from this unit have been documented.
Observations:	During the VSI, the unit appeared to be in sound condition and no evidence of release was noted.

4.0 AREAS OF CONCERN

PRC identified no AOCs during the PA/VSI.

5.0 CONCLUSIONS AND RECOMMENDATIONS

The PA/VSI identified five SWMUs and no AOCs at the GPC facility. Background information on the facility's location; operations; waste generating processes and waste management practices; history of documented releases; regulatory history; environmental setting; and receptors is presented in Section 2.0. SWMU-specific information, such as the unit's description, dates of operation, wastes managed, release controls, history of documented releases, and observed condition, is presented in Section 3.0. Following are PRC's conclusions and recommendations for each SWMU. Table 3, at the end of this section, summarizes the SWMUs at the facility and the recommended further actions.

SWMU 1 **Outdoor Solvent Recovery System**

Conclusions: The Outdoor Solvent Recovery System is located in the west-central section of the facility. The unit is constructed of steel and rests on a concrete base. Also, GPC checks the structural integrity of the unit daily. No releases from this unit have been documented. Because of the unit has sound containment, the potential for release to ground water, surface water, air, and on-site soils is low.

Recommendations: PRC recommends no further action for this unit.

SWMU 2 **Indoor Solvent Recovery System**

Conclusions: The Indoor Solvent Recovery System is located in the western portion of the manufacturing building. The parts washer and still are constructed of steel and rest on sealed concrete. The holding tank has a concrete base and is surrounded by a concrete berm. No releases from this unit have been documented. Because the unit has adequate containment, the potential for release to ground water, surface water, air, and on-site soils is low.

Recommendations: PRC recommends no further action for this unit.

SWMU 2 **Waste Solvent Storage Tank**

Conclusions: The Waste Solvent Storage Tank is located aboveground and outdoors in the central section of the facility. The tank is constructed of steel, has a

sealed concrete base, and is surrounded by a 2-foot-high berm. No releases from the unit have been documented. Because the unit has adequate containment, the potential for release to ground water, surface water, air, and on-site soils is low.

Recommendations: PRC recommends no further action for this unit.

SWMU 4 **Hazardous Waste Storage Area**

Conclusions: The Hazardous Waste Storage Area is located outdoors in the west-central section of the facility. In this area, waste is stored in closed 55-gallon drums on a sealed concrete pad measuring 30 feet by 50 feet. The unit is surrounded by a 1-foot-high concrete berm. No releases from this unit have been documented. Because the unit has adequate containment, the potential for release to ground water, surface water, air, and on-site soils is low.

Recommendations: PRC recommends no further action for this unit.

SWMU 5 **Former Waste Solvent Storage Tank**

Conclusions: The Former Waste Solvent Tank is located outdoors in the west-central section of the facility. The tank stored waste solvent until the early 1980s and now stores virgin ethyl acetate. The tank is located on a sealed concrete base and is surrounded by a 3-foot-high concrete berm. No releases form this unit have been documented. The potential for release to ground water, surface water, air, and on-site soils is low because the unit has adequate containment.

Recommendations: PRC recommends no further action for this unit.

TABLE 3

SWMU SUMMARY

SWMU	Dates of Operation	Evidence of Release	Recommended Further Action
1. Outdoor Solvent Recovery System	1982 to present	None	No further action
2. Indoor Solvent Recovery System	1982 to present	None	No further action
3. Waste Solvent Storage Tank	1982 to present	None	No further action
4. Hazardous Waste Storage Area	1980 to present	None	No further action
5. Former Waste Solvent Tank	Mid-1970s to early 1980s	None	No further action

REFERENCES

Ausich, 1981. The Regional Paleontology and Stratigraphy of Ohio, Wright State University, May.

Colorpac, Incorporated (Colorpac), 1980a. Notification of Hazardous Waste Activity form for the Colorpac Facility, August 14.

Colorpac, 1980b. Part A Permit Application Filed with EPA, October 21.

Colorpac, 1985. Letter to EPA Stating That All Hazardous Waste had been Removed Off Site, January 10.

Graphic Packaging Corporation (GPC), 1988. Letter to EPA Listing Corrections to Violations Found During August 1988 Inspection of Facility, September 6.

GPC, 1992. Ownership Information Provided by GPC During VSI, December 10.

National Flood Insurance Program, 1987. Flood Plain Information for the GPC Area.

Ohio Department of Natural Resources (ODNR), 1992. Well Log Packet for Area Near the GPC Facility.

Ohio Environmental Protection Agency (OEPA), 1982. Letter to Colorpac Regarding Facility's Request for Change in Status, June 22.

OEPA, 1988. Letter to GPC Regarding August 16, 1988, Inspection of the Facility, August 22.

OEPA, 1989a. Letter to GPC Regarding May 1989 Inspection of the Facility, May 30.

OEPA, 1989b. Letter to GPC Acknowledging Sufficient Corrections to Violations Found During May 1989 Inspection of Facility, August 8.

PRC Environmental Management, Inc. (PRC), 1991. Telephone Conversation Between Peter Zelinskas, PRC, and S. Lewis, City of Franklin Water Maintenance, February 20.

PRC, 1993. Telephone Conversation Between Kate Reising, PRC, and B. Simpson, City of Franklin Public Works Department, February 9.

Todd, D.K., 1983. Ground Water Resources of the United States, Premier Press, Berkeley, California.

U.S. Department of Agriculture (USDA), 1973. Soil Survey of Warren County, Ohio, March.

U.S. Department of Commerce (USDC), 1961. Rainfall Frequency Atlas, May.

U.S. Environmental Protection Agency (USEPA), 1981. Letter to Colorpac Regarding Incomplete Part A Permit Application, October 16.

USEPA, 1982. Acknowledgement of Colorpac's Complete Part A Permit Application, May 27.

USEPA, 1984. Letter to Colorpac Regarding Closure Requirements for the Facility, November 28.

USEPA, 1985. Notification of Change in Regulatory Status for Colorpac, March 13.

U.S. Geological Survey (USGS), 1981. 7.5 Minute Quadrangle Topographic Map, Franklin, Ohio.

ATTACHMENT A

EPA PRELIMINARY ASSESSMENT FORM 2070-12

EPA

POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 1 - SITE INFORMATION AND ASSESSMENT

I. IDENTIFICATION

01 STATE	02 SITE NUMBER
OH	OHD 058 394 313

II. SITE NAME AND LOCATION

01 SITE NAME *(Legal, common, or descriptive name of site)*	02 STREET, ROUTE NO. OR SPECIFIC LOCATION IDENTIFIER				
Graphic Packaging Corporation	708 South Avenue				
03 CITY	**04 STATE**	**05 ZIP CODE**	**06 COUNTY**	**07 COUNTY CODE**	**08 CONG DIST**
Franklin	OH	45005	Warren	165	
09 COORDINATES: LATITUDE 39°33'50"N	**LONGITUDE** 85°18'55"W				

10 DIRECTIONS TO SITE *(Starting from nearest public road)*

Travel North on Main Street. Turn left onto new bridge. Travel northwest on Park Avenue. Turn left onto Cedar Street. Then turn right onto South Avenue; Graphic Packaging is on the left.

III. RESPONSIBLE PARTIES

01 OWNER *(if known)*	02 STREET *(Business, mailing residential)*		
ACX Technologies, Inc.	1600 Table Mountain Parkway		
03 CITY	**04 STATE**	**05 ZIP CODE**	**06 TELEPHONE NUMBER**
Golden	CO	80401	
07 OPERATOR *(If known and different from owner)*	**08 STREET** *(Business, mailing, residential)*		
09 CITY	**10 STATE**	**11 ZIP CODE**	**12 TELEPHONE NUMBER**

13 TYPE OF OWNERSHIP *(Check one)*

☒ A. PRIVATE ☐ B. FEDERAL: _____ *(Agency Name)* ☐ C. STATE ☐ D. COUNTY ☐ E. MUNICIPAL

☐ F. OTHER _____ *(Specify)* ☐ G. UNKNOWN

14. OWNER/OPERATOR NOTIFICATION ON FILE *(Check all that apply)*

☒ A. RCRA 3010 DATE RECEIVED: 10/21/80 (MONTH DAY YEAR) ☐ B. UNCONTROLLED WASTE SITE *(CERCLA 103 c)* DATE RECEIVED: / / (MONTH DAY YEAR) ☐ C. NONE

IV. CHARACTERIZATION OF POTENTIAL HAZARD

01 ON SITE INSPECTION BY *(Check all that apply)*

☒ YES DATE 12/10/92 ☐ A. EPA ☒ B. EPA CONTRACTOR ☐ C. STATE ☐ D. OTHER CONTRACTOR

☐ NO ☐ E. LOCAL HEALTH OFFICIAL ☐ F. OTHER: _____ *(Specify)*

CONTRACTOR NAME(S): PRC Environmental Management, Inc. (PRC)

02 SITE STATUS *(Check one)*

☒ A. ACTIVE ☐ B. INACTIVE ☐ C.UNKNOWN

03 YEARS OF OPERATION

1962 | present (BEGINNING YEAR ENDING YEAR) ☐UNKNOWN

04 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KNOWN, OR ALLEGED

The Graphic Packaging facility generates off-specification printing ink (D001, F003, F005), solvent still bottoms (D001, F003, F005), still bottom ink sludge (D001, F003, F005), nonhazardous waste cleaning solution, and wastewater.

05 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPULATION

The facility poses a low potential hazard to the environment or population.

V. PRIORITY ASSESSMENT

01 PRIORITY FOR INSPECTION *(Check one. If high or medium is checked, complete Part 2 - Waste Information and Part 3 - Description of Hazardous Conditions and Incidents.)*

☐ A. HIGH *(Inspection required promptly)* ☐ B. MEDIUM *(Inspection required)* ☒ C. LOW *(Inspect on time-available basis)* ☐ D. NONE *(No further action needed; complete current disposition form)*

VI. INFORMATION AVAILABLE FROM

01 CONTACT	02 OF *(Agency/Organization)*			03 TELEPHONE NUMBER
Kevin Pierard	U.S. EPA			(312) 886-4448
04 PERSON RESPONSIBLE FOR ASSESSMENT	**05 AGENCY**	**06 ORGANIZATION**	**07 TELEPHONE NUMBER**	**08 DATE**
Pete Zelinskas		PRC	(513) 241 - 0149	02/07/93 (MONTH DAY YEAR)

ATTACHMENT B

VISUAL SITE INSPECTION SUMMARY AND PHOTOGRAPHS

VISUAL SITE INSPECTION SUMMARY

Graphic Packaging Corporation
708 South Avenue
Franklin, Ohio 45005
OHD 058 394 313

Date:	December 10, 1992
Primary Facility Representative:	Ron Kline
Representative Telephone No.:	(513) 746-4511
Additional Facility Representatives:	Russell DeVilbiss Wayne Wilson
Inspection Team:	Pete Zelinskas (PRC) Kate Reising (PRC)
Photographer:	Kate Reising
Weather Conditions:	Raining, 45°F
Summary of Activities:	The visual site inspection (VSI) began at 1:30 p.m. with an introductory meeting. The inspection team explained the purpose of the VSI and the agenda for the visit. Facility representatives then discussed the facility's past and current operations, solid wastes generated, and release history. Facility representatives provided the inspection team with copies of requested documents. The VSI tour began at 2:45 p.m. and involved a walk-through of the facility. PRC observed the entire facility, including the Outdoor Solvent Recovery System (SWMU1), the Indoor Solvent Recovery System (SWMU 2), the Waste Solvent Storage Tank (SWMU 3), the Hazardous Waste Storage Area (SWMU 4), and the Former Waste Solvent Tank (SWMU 5). PRC examined the concrete throughout the facility for cracks and stains. PRC noted that it was structurally sound and free of stains. The tour concluded at 3:45 p.m., after which the inspection team held an exit meeting with facility representatives. The VSI was completed and the inspection team left the facility at 4:00 p.m.

Photograph No. 1 Location: SWMU 1
Orientation: South Date: 12/10/92
Description: Outdoor Solvent Recovery System; tanks containing charcoal beds.

Photograph No. 2 Location: SWMU 2
Orientation: South Date: 12/10/92
Description: Indoor Solvent Recovery System.

Photograph No. 3
Orientation: South
Description: The Waste Solvent Storage Tank.

Location: SWMU 3
Date: 12/10/92

Photograph No. 4
Orientation: Southeast
Description: Hazardous Waste Storage Area.

Location: SWMU 3
Date: 12/10/92

Photograph No. 5
Orientation: Southwest
Description: Former Waste Solvent Tank.

Location: SWMU 4
Date: 12/10/92

ATTACHMENT C

VISUAL SITE INSPECTION FIELD NOTES

18 PZ

12-10-92 19

VSI to Graphic Packaging
Franklin, Ohio
Site contact - Ron Klise
PRC: Pete Zeliastas
Kate Reising - Photos
Conditions: Rainy, cool
≈ 45°F. Graphic Packaging
is a labeling company
in a industrial/residential
part of Franklin.

1330 Operation - Devon
Rotogravure printing
Flexographic printing
Lamination
Laminator extruding
Solvent and
* Solvent recovery system

[signature] 12-10-92

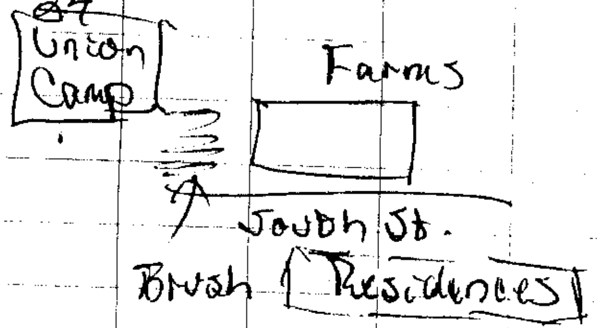
Water wells - Franklin
Graphic Packaging giving
us a lot of handouts
Sampling wastewater
Permit to City of Franklin.
* Create Flexible packaging
Soap wrappers currently the
main product here.
* Waste ink, usually reuse
ink. Distillation here
Reclaimed energy Company
Connelsville Ind.
* Reclamation/Fuels blending
to a concrete plant.
* Safety Kleen no longer.
* Totally fenced, fire system
3 shifts, 120 employees
* Air permits - ≈32 for inks
+ solvents.
[illegible] 12-10-92

* Wastewater - metals, pH
flow, no oils, Quarterly.
* Oils and hydraulic fluids
go out with still bottoms
and solvents.
No NPDES.
→ Tank pulls
Cooling water to pond
percolates into ground
Building above ground
tanks. ≈1980. Built
small containment area
around tanks.
No industrial wells.
1445 Site walk around
Inloop solvent recovery
system throughout.
Still. Clean solvent
being generated.
[illegible] 12-10-92

Solvents pumped directly
to still. Solvents pumped
to washer.
Stormwater to groundwater
* Haz. waste sto area.
Bermed. = 30 x 50 1980
4" berm. Not covered.
A few small cracks.
≈ 80 drums on-site
Moving mixing area
to rear of plant.
* Boiler blowdown, cooling
tower water, stormwater
* Pond
* Solvent Recovery System
VOCs into system 1982
→ Filter (paper) →
Charcoal ~~tanks~~ 10' x 40'
air ~~through~~ charcoal
[signature] 12-10-80

Have to add charcoal
No removal ≈ 400 gal/day
Water solvent mixture
Charcoal removal occasionally
Water 90% reclaim.
* Dirty solvent tank
To distiller 12,000 gal
Stormwater sampled
1988
* Waste Tank at one time
pre 1980 on berth
Used for waste solvent
at one time. Former sump
Late 1980's Now
Ethyl Acetate = 5,000 gal
* Completed site
walk around.

[signature] 12-10-82



1650 RHC exiting site after closing meeting

12-18-90

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:
HRE-8J

November 30, 1992

Mr. Ron Kline
Graphic Packaging of Ohio Corporation
P.O. Box 308
Franklin, Ohio 45005-0308

Re: Visual Site Inspection
Graphic Packaging of Ohio Corporation
Franklin, Ohio 45005-0308
OHD 058 394 313

Dear Mr. Kline:

The United States Environmental Protection Agency (U.S. EPA) Region V will conduct a Preliminary Assessment including a Visual Site Inspection (PA/VSI) at the referenced facility. This inspection is conducted pursuant to the Resource Conservation and Recovery Act, as amended (RCRA) Section 3007 and the Comprehensive Environmental Response, Compensation, and Liability Act, as amended (CERCLA) Section 104(e). The referenced facility has generated, treated, stored, or disposed of hazardous waste subject to RCRA. The PA/VSI requires identification and systematic review of all solid waste streams at the facility. The objective of the PA/VSI is to determine whether or not releases of hazardous wastes or hazardous constituents have occurred or are occurring at the facility which may require further investigation. This analysis will also provide information to establish priorities for addressing any confirmed releases.

The visual site inspection of your facility is to verify the location of all solid waste management units (SWMUs) and areas of concern (AOCs) to make a cursory determination of their condition by visual observation. The definitions of SWMUs and AOCs are included in Attachment I. The VSI supplements and updates data gathered during a preliminary file review. During this site inspection, no samples will be taken. A sampling visit to ascertain if releases of hazardous waste or constituents have occurred may be required at a later date.

Assistance of some of your personnel may be required in reviewing solid waste flow(s) or previous disposal practices. The site inspection is to provide a technical understanding of the present and past waste flows and handling, treatment, storage, and disposal practices. Photographs of the facility are necessary to document the condition of the units at the facility and the waste management practices used.

The VSI has been scheduled for December 10, 1992, at 1:30 p.m. The inspection team will consist of Pete Zelinskas and Kate Reising of PRC Environmental Management, Inc., a contractor for the U.S. EPA. Representatives of the Ohio Environmental Protection Agency (OEPA) may also be present. Your cooperation in admitting and assisting them while on site is appreciated.

ATTACHMENT I

The definitions of solid waste management unit (SWMU) and area of concern (AOC) are as follows.

A SWMU is defined as any discernable unit where solid wastes have been placed at any time from which hazardous constituents might migrate, regardless of whether the unit was intended for the management of a solid or hazardous waste.

The SWMU definition includes the following:

- RCRA regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells
- Closed and abandoned units
- Recycling units, wastewater treatment units, and other units that U.S. Environmental Protection Agency has generally exempted from standards applicable to hazardous waste management units
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents, such as wood preservative treatment dripping areas, loading or unloading areas, or solvent washing areas

An AOC is defined as any area where a release to the environment of hazardous wastes or constituents has occurred or is suspected to have occurred on a nonroutine or nonsystematic basis. This includes any area where such a release in the future is judged to be a strong possibility.

PRC requests that, if available, the following facility information be provided during the VSI:

1. Two copies of a detailed map of the facility
2. Facility history, including dates of operation, ownership changes, and production processes
3. Current facility operations
4. Processes that generate waste that is treated, stored, or disposed of at the facility
5. Records of disposal of wastes generated at the facility (manifests, annual reports, etc...)
6. Security at the facility
7. Information regarding geology and the uses of ground water and surface water in the area
8. Permits (air, NPDES, etc...) the facility currently holds or has held in the past and documentation of any permit violations that may have occurred
9. Records of any spills that may have occurred at the facility
10. Descriptive operational information (location, dimensions, capacity, materials of construction, etc...), dates of start-up and closure, wastes managed, release controls, and release history for each SWMU

NR

CERTIFICATION REGARDING POTENTIAL RELEASES FROM SOLID WASTE MANAGEMENT UNITS

FACILITY NAME: COLORPAC, INCORPORATED

EPA I.D. NUMBER: OHD - 058 - 394 - 313

LOCATION CITY: FRANKLIN

STATE: OHIO 45005

1. Are there any of the following solid waste management units (existing or closed) at your facility? NOTE - DO NOT INCLUDE HAZARDOUS WASTE UNITS CURRENTLY SHOWN IN YOUR PART A APPLICATION

	YES	NO
° Landfill		x
° Surface Impoundment		x
° Land Farm		x
° Waste Pile		x
° Incinerator		x
° Storage Tank (Above Ground)		x
° Storage Tank (Underground)		x
° Container Storage Area		x
° Injection Wells		x
° Wastewater Treatment Units		x
° Transfer Stations		x
° Waste Recycling Operations		x
° Waste Treatment, Detoxification		x
° Other _____		

2. If there are "Yes" answers to any of the items in Number 1 above, please provide a description of the wastes that were stored, treated or disposed of in each unit. In particular, please focus on whether or not the wastes would be considered as hazardous wastes or hazardous constituents under RCRA. Also include any available data on quantities or volume of wastes disposed of and the dates of disposal. Please also provide a description of each unit and include capacity, dimensions and location at facility. Provide a site plan if available.

NOTE: Hazardous wastes are those identified in 40 CFR 261. Hazardous constituents are those listed in Appendix VIII of 40 CFR Part 261.

3. For the units noted in Number 1 above and also those hazardous waste units in your Part A application, please describe for each unit any data available on any prior or current releases of hazardous wastes or constituents to the environment that may have occurred in the past or may still be occurring.

   Please provide the following information

   a. Date of release
   b. Type of waste released
   c. Quantity or volume of waste released
   d. Describe nature of release (i.e., spill, overflow, ruptured pipe or tank, etc.)

NONE

4. In regard to the prior or continuing releases described in Number 3 above, please provide (for each unit) any analytical data that may be available which would describe the nature and extent of environmental contamination that exists as a result of such releases. Please focus on concentrations of hazardous wastes or constituents present in contaminated soil or groundwater.

N/A GENERATOR

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the submittal is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. (42 U.S.C. 6902 et seq. and 40 CFR 270.11(d))

Rodney L. Kline, V.P./Operations
Typed Name and Title

Rodney L. Kline
Signature

February 11, 1986
Date

F.1 Imagery/Special Studies